

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

----- X
In re: : Chapter 11
MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
Reorganized Debtors.¹ : (Jointly Administered)
----- X

CERTIFICATE OF SERVICE

I, Mikayla Cleary, depose and say that I am employed by Kurtzman Carson Consultants, LLC dba Verita Global (“Verita”), the claims and noticing agent for the Reorganized Debtors in the above-captioned case.

On March 26, 2026, at my direction and under my supervision, employees of Verita caused to be served the following documents via Electronic Mail upon the service list attached hereto as **Exhibit A**; and via First Class Mail upon the service list attached hereto as **Exhibit B**:

- **Notice and Reorganized Debtors’ Third Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit P**; substantially in the form of Docket No. 1383]
- **Notice and Reorganized Debtors’ Fourth Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit Q**; substantially in the form of Docket No. 1384]
- **Notice and Reorganized Debtors’ Fifth Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit R**; substantially in the form of Docket No. 1385]
- **Notice and Reorganized Debtors’ Sixth Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit S**; substantially in the form of Docket No. 1386]

¹ A complete list of each of the reorganized debtors (the “*Reorganized Debtors*”) in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.



- **Notice and Reorganized Debtors' Seventh Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit T**; substantially in the form of Docket No. 1387]
- **Notice and Reorganized Debtors' Eighth Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit U**; substantially in the form of Docket No. 1388]

Furthermore, on March 26, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit C**; and via First Class Mail upon the service list attached hereto as **Exhibit D**:

- **Notice and Reorganized Debtors' Third Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit P**; substantially in the form of Docket No. 1383]

Furthermore, on March 26, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit E**; and via First Class Mail upon the service list attached hereto as **Exhibit F**:

- **Notice and Reorganized Debtors' Fourth Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit Q**; substantially in the form of Docket No. 1384]

Furthermore, on March 26, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit G**; and via First Class Mail upon the service list attached hereto as **Exhibit H**:

- **Notice and Reorganized Debtors' Fifth Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit R**; substantially in the form of Docket No. 1385]

Furthermore, on March 26, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit I**; and via First Class Mail upon the service list attached hereto as **Exhibit J**:

- **Notice and Reorganized Debtors' Sixth Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit S**; substantially in the form of Docket No. 1386]

Furthermore, on March 26, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit K**; and via First Class Mail upon the service list attached hereto as **Exhibit L**:

- **Notice and Reorganized Debtors' Seventh Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit T**; substantially in the form of Docket No. 1387]

Furthermore, on March 26, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit M**; and via First Class Mail upon the service list attached hereto as **Exhibit N**:

- **Notice and Reorganized Debtors' Eighth Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit U**; substantially in the form of Docket No. 1388]

Furthermore, on March 27, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via First Class Mail upon the service list attached hereto as **Exhibit O**:

- **Notice and Reorganized Debtors' Fifth Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit R**; substantially in the form of Docket No. 1385]

Dated: April 2, 2026

/s/ Mikayla Cleary
Mikayla Cleary
Verita
222 N Pacific Coast Highway,
3rd Floor
El Segundo, CA 90245
Tel. 310.823.9000

Exhibit A

Exhibit A

Post-Effective Master Service List
Served via Electronic Mail

Description	CreditorName	CreditorNoticeName	Email
Counsel to Collin County Tax Assessor / Collector	Abernathy, Roeder, Boyd & Hullett, P.C.	Paul M. Lopez, Larry R. Boyd, and Emily M. Hahn	plopez@abernathy-law.com; lboyd@abernathy-law.com; ehahn@abernathy-law.com; bankruptcy@abernathy-law.com
IRS	Internal Revenue Service	Centralized Insolvency Operation	Mimi.M.Wong@irsconsult.treas.gov
IRS	Internal Revenue Service	Centralized Insolvency Operation	Mimi.M.Wong@irsconsult.treas.gov
Counsel to Florence Speaker	Law Firm of Shawn M. Grady, PLLC	Shawn M. Grady	shawn@gradycollectionlaw.com
Top 30 Creditor	Morris And Company	Drew Kenny	dkenny@thinkllp.com
SEC Regional Office	Securities & Exchange Commission	Fort Worth Regional Office	dfw@sec.gov
SEC Headquarters	Securities & Exchange Commission	Secretary of the Treasury	secbankruptcy@sec.gov
Texas Attorney General	Texas Attorney General	Attn Bankruptcy Department	bankruptcytax@oag.texas.gov; communications@oag.texas.gov
United States Attorney Office for the Southern District of Texas	US Attorney Office, Southern District of Texas		usatxs.atty@usdoj.gov; USATXS.CivilNotice@usdoj.gov
Office of the U.S. Trustee for the Southern District of Texas (Houston Division)	US Trustee for the Southern District of Texas	Jana Smith Whitworth	Jana.Whitworth@usdoj.gov

Exhibit B

Exhibit B

Post-Effective Master Service List
Served via First Class Mail

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Counsel to American Express National Bank	Becket & Lee LLP	Christopher Cramer	PO Box 3001		Malvern	PA	19355-0701
IRS	Internal Revenue Service		1919 Smith Street		Houston	TX	77002
Texas Comptroller of Public Accounts	Texas Comptroller of Public Accounts	Attn Bankruptcy Section	Lyndon B Johnson State Office Building	111 East 17th St	Austin	TX	78774
Texas Comptroller of Public Accounts	Texas Comptroller of Public Accounts		PO Box 13528, Capitol Station		Austin	TX	78711-3528
United States Attorney Office for the Southern District of Texas	US Attorney Office, Southern District of Texas	Civil Process Clerk for the U.S. Attorney's Office	1000 Louisiana	Suite 2300	Houston	TX	77002
US Attorney General	US Department of Justice	US Attorney General	950 Pennsylvania Avenue NW		Washington	DC	20530-0001

Exhibit C

Exhibit C

Third Omnibus Objection Claimants Service List
Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
3 VETS & COMPANY LLC	LESTER CAMPBELL	j.campbell@3vetstrucking.net
ACTIVE TRANSPORTATION LLC		jeff@accesable.com
Administrative Services Cooperative, Inc.	Young and Chic LLP	myoung@youngchicllp.com
Administrative Services Cooperative, Inc.		bhristev@layellowcab.com
ADP INC		GINGER.HUNTER.1@ADP.COM
ADVANCED FLOORING SOLUTIONS	ADVANCED FLOORING SOLUTIONS	yschuneman@afslc.com
AGEE, ADRIENNE		Email on File
AL OMOUR, JAMAL		Email on File
ALDERMAN, TIMMY		Email on File
Allied Fire & Safety Equipment Co., Inc.		ar@alliedfiresafety.com; christinecm@alliedfiresafety.com
AMBULNZ NY, LLC	DocGo	subpoenas@docgo.com
AMBULNZ NY, LLC		ap@docgo.com
AMBULNZ NY, LLC		megonzalez@docgo.com; norm@docgo.com
American Ground Transportation	Konstantinos Roditis	kroditis@gmail.com
American Medical Response Ambulance Service, Inc.	Shaun Notary	Shaun.Notary@gmr.net
American Medical Response Mid-Atlantic, Inc.	Shaun Notary	Shaun.Notary@gmr.net
American Medical Response of Inland Empire	Shaun Notary	Shaun.Notary@gmr.net
American Medical Response of New York, LLC	Shaun Notary	shaun.notary@gmr.net
American Medical Response of Southern California	Shaun Notary	Shaun.Notary@gmr.net
American Medical Response West	Shaun Notary	shaun.notary@gmr.net
Amey Alle		Email on File
Angeline Bonamou		Email on File
Antigua, Karin	Gabriel Antigua	Email on File
Antigua, Karin		Email on File
April Atherton		Email on File
Armada, Anthony		Email on File
Atlantic/Palm Beach Ambulance, Inc.	Shaun Notary	Shaun.Notary@gmr.net
B and S Properties	Brett Whiteside	infoarbor1@gmail.com
Baker Hostetler LLP	Elyssa Kates	orlbkruptcy@bakerlaw.com; ekates@bakerlaw.com
Banks, Brooke		Email on File
BARCZAK, CASSIE		Email on File
BAXTER, TOMMIE		Email on File
Benally, Delores Jane		Email on File
BENJAMIN, TORRENCE		Email on File
Berkheimer, Melissa		Email on File
Betty Clark		Email on File
BHUTTO, KAMRAN		Email on File
BIAMONTE GOLDMAN, SUSAN	Mark Goldman	Email on File
BIAMONTE GOLDMAN, SUSAN		Email on File
BIVINS, JOSEPH		Email on File
Bland, Bobby		Email on File
Blythe Ambulance Service	Shaun Notary	shaun.notary@gmr.net
BRINEGAR, JAMES TRAVIS		Email on File
Broward Ambulance, Inc.	Shaun Notary	Shaun.Notary@gmr.net
Burns, Imogene		Email on File
Callahan, Felicia		Email on File
CALSTAR Air Medical Services LLC	Jody C Tullos	jody.tullos@gmr.net; greg.kelminson@gmr.net
Careficient, Inc.		ctaylor@careficient.com
Carestar, LLC		support@gocarestar.com
Carl, Nancy		Email on File
Carson, Chirsty		Email on File
Castillo Rodriguez, Milagros		Email on File
Cellco Partnership d/b/a Verizon Wireless	Verizon	michelle.k.duncan@verizon.com
Cellco Partnership d/b/a Verizon Wireless	William M Vermette	William.Vermette@Verizon.com
Centurion Transportation LLC		centuriontransllc@gmail.com

Exhibit C

Third Omnibus Objection Claimants Service List
Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Certify My Company		accounting@certifymycompany.com
CHAUFFEURED SENIORS LLC		Chauffeured.Seniorsllc@gmail.com
Citizens Community Transport, LLC	c/o Mr. Howard	cct.llc2@gmail.com
CLARK, KENYATTA		Email on File
Claudia Avila		Email on File
CLEAR, ELANA JONES	ELANA CLEAR	Email on File
Coastal Medical Transport Inc		tamarab@coastalmedtrans.com
COFIELD, CHERYL		Email on File
Colker, Jean	Toscani, Stathes & Zoeller, LLC	TToscani@tszlegal.com
COLOGIX US, INC.		luka.znidarcic@cologix.com
COMFORT HEALTHCARE SOLUTIONS LLC		comforthealthcaresolution@gmail.com
Conrady Arrington, Susan		Email on File
COPELAND, TAMIKA J		Email on File
CORONA, PATRICIA		Email on File
Crawford Byerly	Kandi Byerly	Email on File
Crump, Melodia		Email on File
CyraCom International, Inc		accountsreceivable_cyr@propio.com
EDWARD CHARLIP		Email on File
Felicia Marie Chavez		Email on File
Hannah Clay		Email on File
Janet Ashford		Email on File
Jennifer Bradley		Email on File
Justin Bozinta		Email on File
Keslea Brady		Email on File
KOVEY BURNS		Email on File
Lui Chi-wai		Email on File
Lyndsey Daniels Martin		Email on File
Maria Caudill		Email on File
Nahum Castro	Nahum Aaron Castro	Email on File
Nahum Castro		Email on File
Patricia Corrigan		Email on File
Patricia Courtney		Email on File
Patti Brown		Email on File
Scarlett Cooper	Scarlett Lightfoot Cooper	Email on File
Shooshanik Charkhchian	Law Offices of Armen M. Tashjian	Armen@ArmenLaw.com; Steve@ArmenLaw.com
Suzanne Betts, as the Administrator of the Estate of Frances Betts, Deceased	Parker Waichman, LLP	vchung@yourlawyer.com; Gryan@yourlawyer.com
Tashica Burton		Email on File
Valerie Carrejo		Email on File
Yun Chen		Email on File

Exhibit D

**Third Omnibus Objection Claimants Service List
 Served via First Class Mail**

CreditorName	CreditorNoticeName	Address1	City	State	Zip
Aaron, Peggy		Address on File			
ARCHULETA, DEVON L		Address on File			
Bell, Donna		Address on File			
Bland, Bobby		Address on File			
Blankenship, Chad		Address on File			
BRENNEN, BYRON		Address on File			
BYRD, AULINDA		Address on File			
CALES, JEWEL		Address on File			
Careficient, Inc.		PO Box 947531	Atlanta	GA	30394
Colker, Jean		Address on File			
COPELAND, TAMIKA J		Address on File			
CORDOVA, ANGIE		Address on File			
Dahl, Richard A		Address on File			
DARIS, LACIE	Lacie Daris	Address on File			
DARIS, LACIE		Address on File			
Hannah Clay		Address on File			
Maria Caudill		Address on File			
PHYLLIS BENNETT		Address on File			

Exhibit E

Exhibit E

Fourth Omnibus Objection Claimants Service List
Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Brenda Duboise		Email on File
CAROLYN HEATLEY		Email on File
Charles Frangella		Email on File
Diane Gervasi	Napoli Shkolnik PLLC	jnapoli@napolilaw.com
Diaz, Ivette		Email on File
Dickens, Marlon		Email on File
DODGE, MELISSA		Email on File
Dorado, Maria		Email on File
Dowling, Kelly		Email on File
E AND K TN LLC	ADEL MAXIMOUS	adelmaximous1@gmail.com
EDWARDS, TAHIRAH H		Email on File
ELLIS, TIFFANY M	TIFFANY DUNCAN	Email on File
Elwood L Hanchey III		Email on File
Erendira Hernandez	Robert S Gomez	Email on File
Erin Goforth		Email on File
Estate of Charles Edward Whaley	Carrie Orman	Email on File
Estate of Janet Williams	Janai Richard	Email on File
EVANS TRANS LLC		Email on File
Exell Water and Coffee, Inc.		admin@exellcompanies.com; bbrewer@exellcompanies.com
EZMAN, DENEEN		Email on File
FANFAN, MARIE ANGE		Email on File
First Citizens Bank & Trust	Bankruptcy Processing Solutions, Inc	staceygray@aol.com
First Citizens Bank & Trust		staceygray@aol.com
First-Citizens Bank & Trust Company	c/o Weltman, Weinberg & Reis Co., LPA	bronationalecf@weltman.com
Fisher and Phillips LLP		abasil@fisherphillips.com
FIVE9 Inc		alicia.beresford@five9.com
FLOREZ, SANDRA		Email on File
FORBES-PROFFIT, AMBER		Email on File
Fragomen, Del Rey, Bernsen and Loewy, LLP	Jennifer OBrien, Assoc General Counsel	khackett@fragomen.com
FRITH, BONNIE		Email on File
FULLER, LAKESHA O		Email on File
Gabrielle Dingle		Email on File
GARCIA, EILEEN		Email on File
GARCIA, JEANNIE		Email on File
Garcia, Mendy		Email on File
Gartner, Inc.	c/o Eric Goldstein	egoldstein@goodwin.com
Gartner, Inc.	Robert Steagall	Robert.Steagall@gartner.com
Gibson, Alkeshia		Email on File
GILLIAM, DORIS		Email on File
Global Transportation Inc		GLOBALTRANSPORTATION@YMAIL.COM
Glover Shell, Marshea Denise		Email on File
GOMEZ, EDELMIRA	RUBY VALENCIA	Email on File
GOSCHKE, SONYA		Email on File
GRANT, DAVID		Email on File
GRANT, SHELBY J		Email on File
Gravely, Brenda		Email on File
Gray, Eric S		Email on File
Great Blue Research, Inc.		mjv@greatblueresearch.com
Guardian Flight LLC	Jody Tullos	jody.tullos@gmr.net
GUNN, JAMES		Email on File
Hamilton, Chinnema		Email on File
HANEY, TYWANDA		Email on File
HARGRAVE, VIVIAN		Email on File
Harlan, Eric M.	Eric Harlan	Email on File
HARRIS, JASON		Email on File
HARRIS, JASON SR		Email on File
Harrison, Selina		Email on File
HART, AMY		Email on File

Exhibit E

Fourth Omnibus Objection Claimants Service List
Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Hayes, Mary		Email on File
HAYNES, TRALIZE K		Email on File
HELMS, OLETTA		Email on File
HERRERA, CATHY		Email on File
Hexaware Technologies Limited	Attn Hemant Kshirsagar	CHeitzenrater@duanemorris.com
Hexaware Technologies Limited	Duane Morris LLP	CHeitzenrater@duanemorris.com
Hexaware Technologies Limited	Duane Morris LLP	jbillingsley@duanemorris.com
Hickson, Betty		Email on File
Holliday, Kelly		Email on File
HOUNSHELL, BILLY		Email on File
House, Betsy		Email on File
HOWARD, KAY	KAY REMA HOWARD	Email on File
HOWARD, TERRY		Email on File
HOWERTON, PRISCILLA		Email on File
HOWERTON, TINA	PRISCILLA HOWERTON	Email on File
Hughes, Mahogany		Email on File
HYPPOLITE, MARIE G		Email on File
International Life Support, Inc.	Shaun Notary	shaun.notary@gmr.net
Isom, Freda		Email on File
ISOM, HAROLD L		Email on File
J. L HARRIS TRANSPORTATION		jlhtransportation@ameritech.net
Jackson, Katrina		Email on File
Lindsay Hawkins		Email on File
Mark P Donaldson		Email on File
Marybeth Duran as Personal Representative of the Wrongful Death Estate of Richard Chavez	c/o Dathan Weems	dathan@weemshazenlaw.com; bridget@weemshazenlaw.com; greer@weemshazenlaw.com
Marybeth Duran as Personal Representative of the Wrongful Death Estate of Richard Chavez	c/o Ryan E. Chapple	rchapple@cstrial.com
Nasir Dickens		Email on File
Ordley Heatley		Email on File
Rachel A Downs		Email on File
Ronnie L Holsapple		Email on File
Stephanie Hale		Email on File
Trevor Frank		Email on File
Victor Garcia Pena		Email on File

Exhibit F

Fourth Omnibus Objection Claimants Service List
 Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Davis, Betty		Address on File				
Devenport, Gwen		Address on File				
Diaz, Ivette		Address on File				
DRAGO, MARY		Address on File				
FANFAN, MARIE ANGE		Address on File				
First-Citizens Bank & Trust Company		21146 Network Place		Chicago	IL	60673-1211
FREDRIKSEN, PAUL A		Address on File				
Gabrielle Dingle		Address on File				
Gabrielle Dingle		Address on File				
GARCIA, EILEEN		Address on File				
GRAY, EVELYN		Address on File				
Hamilton, Chinnema		Address on File				
Harrison, Selina		Address on File				
HOWERTON, PRISCILLA		Address on File				
HOWERTON, TINA	PRISCILLA HOWERTON	Address on File				
ISOM, HAROLD L		Address on File				
THOMAS GREENE		Address on File				

Exhibit G

**Fifth Omnibus Objection Claimants Service List
Served via Electronic Mail**

CreditorName	CreditorNoticeName	Email
Abra Johnson		Email on File
Brady Lakhiaminh		Email on File
Brittany Knotts		Email on File
Carah Mitchell		Email on File
Chadwyck Linwood		Email on File
David Lu		Email on File
Debra Jones	David May	david@princemay.com
Debra Jones	David May and Benjamin Hillis	david@princemay.com; bnowood@haywardfirm.com
Debra Martinez, as Administrator of the Estate of June Riglietti, Deceased	Craig H Snyder	snyder@yourlawyer.com
Debra Miller		Email on File
DeJon King		Email on File
Gilma Melendez		Email on File
Heather Martinez		Email on File
JACKSON, PATRICK		Email on File
Jacobs, laquanda	LaQuanda Jacobs	Email on File
JAMES, EVANGELINA		Email on File
JARRELL, BRENDA	BRENDA L JARRELL	Email on File
JENKINS, LISA		Email on File
JENSEN, TIFFANY		Email on File
Jersey Central Power & Light		bankruptceast@firstenergycorp.co
Jewell, Charles		Email on File
JOHNSON, ARTHUR		Email on File
JOHNSON, LERANDA		Email on File
Jones, Amiee	Amiee Gibson	Email on File
JONES, DAVID		Email on File
KARABIN, JENNIFER		Email on File
KELLEY, RACHAEL		Email on File
Kelly, Rosa		Email on File
KELLY, SHERON		Email on File
Keyhopper Transportation, Inc	Patti Haws	keyhopperflkeys@aol.com
KISER, MICHELLE		Email on File
Kyle, Scholeigh		Email on File
Lagasse, Deborah (2928)	Lagasse, Deborah	Email on File
Lake Country Area Agency on Aging		mjohnson@lcaaa.org
LaTerra Jones		Email on File
Laura Massimi	Eric G. Kahn, Esq.	ekahn@lawjw.com
Laura Massimi	Javerbaum Wurgaft Hicks Kahn Wikstrom and Sinins	EKahn@LawJW.com; bhanley@lawjw.com
Laura Massimi		Email on File
Law Office of Marc L. Shapiro, P.A.	Laurie H. Anton, Esq.	service@attorneyshapiro.com
LEE PAIGE DBA MEDUPORT		lcpaige69@hotmail.com
LETICIA LLORENS		Email on File
Leverette, Thomas		Email on File
Lewis Hagar, Estate of Johnnie Hagar	Tommy Servos	tservos@servoslawfirm.com
Lewis, Diamon		Email on File
LEYBA, MARIA	Sthephanny Mola	Email on File
LEYBA, MARIA		Email on File
LifeFleet Southeast, Inc.	Shaun Notary	shaun.notary@gmr.net; greg.kelminson@gmr.net
LinkedIn Corporation	Attn David P. Papiez	dpapiez@foxrothschild.com

Exhibit G

Fifth Omnibus Objection Claimants Service List
Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Lui Chi-wai		Email on File
MACK, TENISHA		Email on File
MARCELIN, NADEGE		Email on File
MARHABA TRANSPORT SERVICES LLC		marhabagrantransport@gmail.com
Mariona, Gloria		Email on File
MARTIN, TINA		Email on File
Martinez, Heather N		Email on File
MASSEY, GINA		Email on File
MATTHEWS, MAXINE COLA		Email on File
MCCLAIN, LISA		Email on File
Mcgee, Yvonne		Email on File
MCKENZIE, PRISCILLA		Email on File
McKinney, Willie		Email on File
Medevac MidAmerica, Inc.	Shaun Notary	shaun.notary@gmr.net
Medi-Car Ambulance Service, Inc.	Shaun Notary	Shaun.Notary@gmr.net
Medics Ambulance Service, Inc.	Shaun Notary	shaun.notary@gmr.net
MERCER US LLC		Mercer.na.ar@mmc.com
Miami Lakes Center LLC	Abbigail Webb	abbigail@dodgemiami.com
Miami Lakes Center LLC	C. Craig Eller	celler@kelleylawoffice.com
MIDDLETONS TRANSPORT LLC	JACKEYA WHITTEN	midtransllc@gmail.com
Miguel A Macias		Email on File
Miles, Carl		Email on File
Miller, Joseph		Email on File
MJ Simon and Company		kim@rapoza.org
MONTANO, LARRY		Email on File
Moon, Mary	Amy Moon, Administrator for Estate of Mary Moon	Email on File
MORRELL, KAYLEE		Email on File
Morris, William		Email on File
Mufalli, William		Email on File
Naveed Khan		Email on File
Sebastian Masneri	Sebastian G Masneri	Email on File
Stephen Morris	Valerie Mesoraca	Email on File
Thandi Lee		Email on File
Thomas Leverette		Email on File
Tiffany N Jensen	Marlo Jensen	Email on File
Tiffany N Jensen		Email on File
Yucef McMillan		Email on File

Exhibit H

Exhibit H

**Fifth Omnibus Objection Claimants Service List
Served via First Class Mail**

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Debra Martinez, as Administrator of the Estate of June Riglietti, Deceased	Craig H Snyder	Parker Waichman LLP	6 Harbor Park Drive S.	Port Washington	NY	11050
Jacobs, laquanda		Address on File				
JAMES, BRANDY		Address on File				
JEAN LOUIS, WIDELENE		Address on File				
Johnson, Flora		Address on File				
JONES, DAVID		Address on File				
Kile, Barbara		Address on File				
LAWRENCE, MISTY		Address on File				
Lingo, Jennifer		Address on File				
Liu, Qian		Address on File				
LOPEZ, ALVARO		Address on File				
Lopez, Troy		Address on File				
MARTINEZ, MIKE		Address on File				
Mcgee, Yvonne		Address on File				
MCNEAL, YOLANDA		Address on File				
Mcneil, Yolanda		Address on File				
Moore, Salinda		Address on File				
MORRISON, SHERRY		Address on File				

Exhibit I

Exhibit I

Sixth Omnibus Objection Claimants Service List
Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Angel Naranjo		Email on File
Brenda A Mukai		Email on File
David Patterson		Email on File
David Troy Patterson		Email on File
Dianne Outland		Email on File
Ian Porter		Email on File
Jeffquez Lyntwun Nichols		Email on File
Keiffer Roy		Email on File
Leslie Rufenacht		Email on File
Lisa Sallaj		Email on File
Marc L. Shapiro, PA		service@attorneyshapiro.com
MEHER PATEL		Email on File
Michael Anthony Noga	Robert Anthony Padilla	Email on File
Michelle Renaud		Email on File
		jen@aitkenlaw.com; darren@aitkenlaw.com; mailbox@aitkenlaw.com
Moira Sandrock	Darren O. Aitken, Esq.	
MUNDELL, DOLLY M		Email on File
MUSSEMAN, JACQUEYLIN		Email on File
Naha Mendoza, Melody		Email on File
NEALIS, DOTTIE		Email on File
Nealis, William Edward		Email on File
Negron Laracuenta, Carlos		Email on File
Nelson, Donnell		Email on File
NEMT Insurance DE LLC, Series 1	Brian Thomas, Esquire	brian.thomas@wbd-us.com
NEMT Insurance, DE LLC	Brian Thomas, Esquire	brian.thomas@wbd-us.com
NEMT Insurance, LLC	Brian Thomas, Esquire	brian.thomas@wbd-us.com
Nesha Shelton		Email on File
Octopus Deploy Pty. Ltd.	c/o Legal Department	legal@octopus.com
Oladipupo Ogunyemi		Email on File
ORDAZ, CARMEN		Email on File
Orzoria, Kelly		Email on File
OSBOURNE, KELSEA		Email on File
Pacific East Research Inc	Scott Rice	crobinson@pacificeast.com
PATEL, KAMLESH		Email on File
PEAK, ERICKA		Email on File
PEARSON, KENNETH		Email on File
PELL, CARLA		Email on File
Pelletier, Taylor	Taylor Pelletier	Email on File
Pelletier, Taylor		Email on File
Penelec		bankruptcyEast@firstenergycorp.com
PERDOMO, NICK		Email on File
Perry, Hannah		Email on File
Person, Jamell		Email on File
PETIT		jean.horold@outlook.fr
Phillips, April	April Broom Phillips	Email on File
Phillips, April		Email on File
Pilgrim, Ronald		Email on File
Pinzon, Jimmy		Email on File
Pitney Bowes Global Financial Services LLC		faith.santiago@pb.com
PK TRANSPORTATION LLC		pamela@pktransportationllc.com
Plesko, Jenna		Email on File

Exhibit I

Sixth Omnibus Objection Claimants Service List
Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
PODWILS, EILENE		Email on File
POLLARD, KEESHA		Email on File
Pratt, Hollie		Email on File
PRESSLEY, MICHELE		Email on File
PRICE, RAMONA		Email on File
Prisma Health Ambulance Service	EMSMC	hipaacompliance@emsmc.com
Prisma Health Ambulance Service	Prisma Health EMS	hipaacompliance@emsmc.com
PROFESSIONAL MEDICAL TRANSPORTATION CORP		xiomiami@aol.com
Pulumi Corporation		liqin@pulumi.com
Quintana, Adam		Email on File
Ramos, Monica		Email on File
Ramsey, Camilla		Email on File
Rawlins, Maya		Email on File
REACH Air Medical Services LLC	Jody C Tullos	jody.tullos@gmr.net; greg.kelminson@gmr.net
Rebecca Pizzitola		Email on File
Reed, Sequaia Marie		Email on File
REEDER, PAMELA	PAMELA J. REEDER	Email on File
Rehrig, Jennifer		Email on File
Rehrig, Nikki		Email on File
Reinsburrow, Danelle		Email on File
Reinsburrow, Joshua		Email on File
RESEARCH DATA GROUP INC		accounting@rdgfillings.com
Rhymer, Helena		Email on File
RICE, PHYLLIS	Phyllis Rice	Email on File
Richard, Robert		Email on File
RIVERS, MINDY		Email on File
ROBERSON, TURNELL R	TURNELL RASHAD ROBERSON	Email on File
ROBERTSON, GEORGINA		Email on File
Robinson, Lorene		Email on File
RODGERS, ROSIE		Email on File
Rogelio Ramirez	Claudia Avila	Email on File
Rogelio Ramirez		Email on File
Rollyson, Barry		Email on File
ROMAN, JASMINE		Email on File
ROWE, JENNIFER		Email on File
Rubin, Lisa		Email on File
SANTIAGO, TOMASITA	MARA SALAS	Email on File
Sapp, Karen		Email on File
Schemansky, Christy D		Email on File
Sexton, Serena		Email on File
SH Transport	Georgia Simmons	shtransport60@gmail.com
Shatina Nichols		Email on File
Shaw, Melissa		Email on File
Shires, Alyssa		Email on File
Shirk, Monica		Email on File

Exhibit J

Exhibit J

Sixth Omnibus Objection Claimants Service List
Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
NEISWENDER, BARBARA E	Barbara Neiswender	Address on File				
NEISWENDER, BARBARA E		Address on File				
Nichols, David		Address on File				
Nocktonick, Beverly		Address on File				
OSBOURNE, KELSEA		Address on File				
PATTON, TORREY		Address on File				
Ramautar, Nicole		Address on File				
RAPER, LINDA		Address on File				
Reinsburrow, Joshua		Address on File				
RESEARCH DATA GROUP INC		816 ROANOKE BLVD		SALEM	VA	24153
RICE, PHYLLIS		Address on File				
Richard, Robert		Address on File				
RODGERS, ROSIE		Address on File				
SCOTT, AMANDA		Address on File				
Shelton, Sheila		Address on File				
Shires, Alyssa	Alyssa Shires	Address on File				

Exhibit K

Exhibit K

Seventh Omnibus Objection Claimants Service List
Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Angela Spencer		Email on File
Berenice Veloz		Email on File
Carla Williams and Rodrick Hackworth	Jessica Rodriguez	jessicar@harperlawtx.com
Carla Williams and Rodrick Hackworth	Taylor W. Harper, Esq.	taylor@harperlawtx.com
CHRISTY KIMIKO SULLIVAN		Email on File
Heather Swick	c/o Joseph Lemkin	jlemkin@stark-stark.com
James Oliver Stephens	L.A. Injury Attorneys	legal@lainjuryattorneys.com
Jeffrey Vagnetti		Email on File
LeMarcus Williams		Email on File
Leonora Smith		Email on File
Mary Simon		Email on File
Mayra Solis Bravo		Email on File
Miguel Avelardo Vigil and Lilia Vigil		Email on File
Natasha, Turner		Email on File
Paulette Smith		Email on File
Sevve Stember		Email on File
Sheretta Williams		Email on File
SHOEMAKER, RUTH		Email on File
SHRADER, BRITTNEY R		Email on File
Shrock, Jennifer	Jennifer L Shrock	Email on File
Shubalis, Hailey		Email on File
SIBERT, BARBRA		Email on File
Simmons, Samuel	Lindsey Simmons	Email on File
SIMS, JOYCE		Email on File
SLORES, JERONIMO		Email on File
Smith, Chassity	Chassity Smith	Email on File
Smith, Chassity		Email on File
Smith, Daliah		Email on File
Smith, John		Email on File
SPECIALTEE TRANSPORTATION		mstiffany_wilson@yahoo.com
STACY, TIMOTHY		Email on File
STEPHANIE WHITE		Email on File
Stewart, Adeline		Email on File
Stone Kalfus LLP	Katie Arabis	katie.arabis@stonekalfus.com
Stone, Ashley		Email on File
Study, Carolyn		Email on File
Sullivan, David		Email on File
SUMMERVILLE, MARY		Email on File
Superior Air-Ground Ambulance Service, Inc.	Illinois Medi-Car, Inc.	pparent@superiorambulance.com
Superior Air-Ground Ambulance Service, Inc.	Kim Godden	kgodden@superiorambulance.com; pparent@superiorambulance.com
Superior Air-Ground Ambulance Service, Inc.	Superior Air-Ground Ambulance Service of Ohio, Inc.	pparent@superiorambulance.com
SUPERIOR MEDICAL TRANSPORTATION LLC	Awel Ali	awelali@sbcglobal.net
SUPERIOR MEDICAL TRANSPORTATION LLC		awelali@sbcglobal.net
SUTHERLAND, CHRISTOPHER LEE	CHRISTOPHER SUTHERLAND	Email on File
SWICK, KEVIN		Email on File
Tarby, Tracy	Tracy Morgan	Email on File
TAYLOR, CHRISTINE		Email on File
Teagle, Angie R	Mary Elizabeth Teagle	Email on File
Telos Actuarial, LLC	Telos Actuarial	jstrock@telosactuarial.com
The Sabine Council on Aging, Inc.		vweaver@sabinecoa.org

Exhibit K

Seventh Omnibus Objection Claimants Service List
Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
THE TRANSIT SYSTEM INC		transit@thetransitsystem.com
Theriault, Bonnie		Email on File
Thomas, Beverly		Email on File
TOOTHAKER, GARRETT		Email on File
Tori Woodley		Email on File
Torres, Amida		Email on File
Travelers	Attn. Jonathan H. Miller	jmille31@travelers.com
TRAVIS, WHITNEY LEIGH		Email on File
Travis, Yvonne		Email on File
TRUE TO CARE LLC		Email on File
TUNSTALL, ANTIONETTE		Email on File
Tyliesha Simms		Email on File
Tyliesha Simms		Email on File
ULYSSE, ISELAINÉ		Email on File
Valenzuela, Shadoe		Email on File
VANCE, FRANCIS		Email on File
Venglevska, Mariela		Email on File
VERIFIED FIRST LLC		billing@verifiedfirst.com
VERIFIED FIRST LLC		tax@verifiedfirst.com; billing@verifiedfirst.com; lwhetter@verifiedfirst.com
Victoria Thompson		Email on File
Virginia Medical Transport, LLC	Shaun Notary	Shaun.Notary@gmr.net
WALDRON & COMPANY, INC.	Accounting at SparkEffect	accounting@sparkeffect.com
WALDRON & COMPANY, INC.		accounting@sparkeffect.com; yvonne.york@sparkeffect.com
Waldron and Company Inc.		yvonne.york@sparkeffect.com
Walker, Gwendolyn A		Email on File
WATSON, RYAN		Email on File
WATTS, JENNIFER		Email on File
WES Corporation Inc	DBA Omnipresent Adult Day Care	jdwright7@bellsouth.net
WestFax, Inc.	Christina Barba	accounting@westfax.com; cbarba@westfax.com
Westmed Ambulance, Inc.	Shaun Notary	Shaun.Notary@gmr.net
White, Shanel L		Email on File
WHITNEY, LAREE		Email on File
William Stegall		Email on File
WILLIAMS, CARLTON JR		Email on File
WILLIAMS, MIKAYLA		Email on File
Williams, Sherry		Email on File
WILLIAMS, STEPHANIE		Email on File
WILLIS RONNIE	Ronnie Willis	Email on File
WILLIS RONNIE		Email on File
Wilson, Ambrosia		Email on File
WITHROW, JERRY		Email on File
Yolanda Underwood	Chandler Ariel Underwood	Email on File
Yolanda Underwood		Email on File

Exhibit L

**Seventh Omnibus Objection Claimants Service List
Served via First Class Mail**

CreditorName	Address1	Address2	City	State	Zip
SHRADER, BRITTNEY R	Address on File				
STEELMAN, STEPHANIE	Address on File				
Sykes, Lisa	Address on File				
THOMAS, CYNCERIE	Address on File				
THOMAS, SHAWN	Address on File				
THOMPSON, MARIA	Address on File				
Whetstone, Carolyn Y.	Address on File				
White, Lillie M	Address on File				

Exhibit M

**Eighth Omnibus Objection Claimants Service List
Served via Electronic Mail**

CreditorName	CreditorNoticeName	Email
Robert Yildiz		Email on File
Worsley, Sultan G		Email on File
WREN, PATTIE	PATTIE A WREN	Email on File
WRIGHT, SHARON		Email on File
YAHWEH TRANSPORT SERVICES LLC		yahwehtransportser@gmail.com
ZACKERY, KENYETTA N		Email on File
ZarleyConley	John Gilbertson	accounts@zarleyconley.com
ZBS Logistics, LLC		tonyahazelton@zbslogistics.com
ZUMWALT, APRIL		Email on File

Exhibit N

Exhibit N

**Eighth Omnibus Objection Claimants Service List
Served via First Class Mail**

CreditorName	CreditorNoticeName	Address1	City	State	Zip
Helen Youngblood		Address on File			
Robert Yildiz	Deniz, Selma	Address on File			

Exhibit O

Exhibit O

**Supplemental Fifth Omnibus Objection Claimant Service List
Served via First Class Mail**

CreditorName	Address1	City	State	Zip
JONES, DAVID	Address on File			

Exhibit P

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

-----	X
	:
In re:	: Chapter 11
	:
MODIVCARE INC., <i>et al.</i> ,	: Case No. 25-90309 (ARP)
	:
Reorganized Debtors. ¹	: (Jointly Administered)
	:
-----	X

NOTICE OF REORGANIZED DEBTORS’ THIRD OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Claimants receiving this notice (this “Notice”) should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by April 25, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the “*Reorganized Debtors*”) have filed the Objection attached hereto as **Appendix 1** (the “*Omnibus Objection*”) to your claim(s).²

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf is deficient because: the Proof of Claim was not timely filed by the deadline set by the Court.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Omnibus Objection.

disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "**Response**") with the United States Bankruptcy Court for the Southern District of Texas (the "**Court**") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **April 25, 2026, at 4:00 p.m. (prevailing Central Time)**.

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at <https://www.txs.uscourts.gov> or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **April 25, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to **disallow and expunge** your Claim(s) based on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in the Chapter 11 Cases (the "**Objection Procedures**").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures requires that each Response must contain the following information (at a minimum):

a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

the following contact information for the responding party:

the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **April 25, 2026**, at 4:00 p.m. (prevailing Central Time) unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov>. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

----- X
 :
 In re: : Chapter 11
 :
 MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

**REORGANIZED DEBTORS' THIRD
OMNIBUS OBJECTION TO CERTAIN CLAIMS (LATE-FILED CLAIMS)**

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THE BANKRUPTCY CASE. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED WITHOUT A HEARING.

TO THE CLAIMANTS WHOSE CLAIMS ARE SUBJECT TO THIS OBJECTION:

YOUR SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND ANY FURTHER OBJECTIONS THAT MAY BE FILED IN THE CHAPTER 11 CASES.

THE RELIEF SOUGHT IN THIS OBJECTION IS WITHOUT PREJUDICE TO THE RIGHTS OF THE REORGANIZED DEBTORS AND THEIR ESTATES OR OTHER PARTIES IN INTEREST TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED HEREIN AND OTHER CLAIMS FILED IN THE CHAPTER 11 CASES.

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

The above-captioned reorganized debtors (prior to the Effective Date,² collectively, the “*Debtors*” and after the Effective Date, collectively, the “*Reorganized Debtors*”) respectfully state the following in support of this omnibus claims objection (this “*Objection*”).

RELIEF REQUESTED

1. By this Objection, the Reorganized Debtors seek entry of an order substantially in the form attached hereto (the “*Proposed Order*”) disallowing the claims listed on **Schedule 1** (the “*Late-Filed Claims*”) to the Proposed Order in their entirety because each of the Late-Filed Claims was filed after the applicable Claims Bar Date.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the “*Court*”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution.

3. Each of the Late-Filed Claims that are the subject of this Objection were asserted on proof of claim forms (each a “*Proof of Claim*” and collectively the “*Claim Forms*”) filed with the Claims and Noticing Agent (as defined below). By seeking recovery from the Reorganized Debtors’ estates based on the filing of a Proof of Claim, the holders of the Late-Filed Claims (each a “*Claimant*” and collectively the “*Claimants*”) have submitted to the Court’s jurisdiction over this matter.

4. Venue of the Chapter 11 Cases and this Objection in this district is proper under 28 U.S.C. §§ 1408 and 1409.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1055, Ex. A] (together with all supplemental or supporting documentation related thereto, the “*Plan*”), as applicable.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “**Bankruptcy Local Rules**”), and the Procedures for Complex Cases in the Southern District of Texas.

BACKGROUND

6. On August 20, 2025, the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered, for procedural purposes only, pursuant to Rule 1015(b) of the Bankruptcy Rules and Rule 1015-1 of the Bankruptcy Local Rules. The factual background regarding the Debtors, including their business, their capital structure, and the events leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First-Day Relief* [Docket No. 14].

7. On December 15, 2025, the Court entered the Confirmation Order³ which, among other things, confirmed the Plan. The Effective Date occurred on December 29, 2025.

CLAIMS RECONCILIATION PROCESS

8. On August 21, 2025, the Court entered the *Order Establishing (A) Bar Dates and Related Procedures for Filing Proofs of Claim; (B) Approving the Form and Manner of Notice Thereof; and (C) Granting Related Relief* [Docket No. 66] (the “**Claims Bar Date Order**”) setting, *inter alia*, October 1, 2025, as the deadline for non-governmental creditors and interest holders to file claims in the Chapter 11 Cases (the “**General Bar Date**”).

³ Docket No. 1055.

9. The deadline for all governmental units asserting a “claim” (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose on or prior to the Petition Date to file a Proof of Claim on account of such claim was February 16, 2026, at 5:00 p.m. (prevailing Central Time) (the “**Governmental Bar Date**” and together with the General Bar Date, as applicable depending on whether the claimant is a governmental unit or non-governmental unit, the “**Claims Bar Date**”).

10. The Claims Bar Date Order establishes certain requirements that a filed claim must satisfy to be considered valid. A filed claim must, among other things, “set forth with specificity the legal and factual basis for the alleged claim,” and “include supporting documentation or an explanation as to why such documentation is not available.” Claims Bar Date Order, ¶ 7. If such filed claims are not properly submitted prior to the Claims Bar Date, the Claims Bar Date Order provides that the relevant claimant “shall not be treated as a creditor with respect to such claim for purposes of voting and **distribution**.” *Id.* at ¶ 20 (emphasis added).

11. On August 23, 2025, the Reorganized Debtors’ claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global (the “**Claims and Noticing Agent**”), mailed notice of the Claims Bar Date (the “**Bar Date Notice**”) to potential claimants in accordance with the procedures set forth in the Claims Bar Date Order. *See Affidavit of Service* [Docket No. 98]. Also, as certified at Docket No. 142, in accordance with the Claims Bar Date Order, the Reorganized Debtors published the Bar Date Notice in *The New York Times* on August 26, 2025. *See Affidavit of Publication of the Notice of Deadline for the Filing of Proofs of Claim, Including for Claims Asserted Under Section 503(b)(9) of the Bankruptcy Code in the New York Times* [Docket No. 142].

12. The Reorganized Debtors also listed numerous claims in their Schedules⁴ (such claims, along with the claims asserted in each proof of claim filed in the Chapter 11 Cases, collectively, the “**Claims**”), some of which have been satisfied under the authority granted to the Reorganized Debtors pursuant to certain “first day” orders and other orders entered in these Chapter 11 Cases. A database of all Claims is being maintained by the Reorganized Debtors’ Claims and Noticing Agent (the “**Claims Register**”).⁵ Pursuant to the Plan, the Claims Objection Deadline is currently, subject to the Reorganized Debtors’ right to seek a further extension of such deadline in accordance with the Plan,⁶ March 29, 2026 (*i.e.*, the date that is ninety (90) days after the occurrence of the Effective Date).⁷

13. On February 19, 2026, the Court entered the *Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1313] (the “**Omnibus Objection Procedures Order**”) approving the procedures for filing and resolving omnibus objections to Claims asserted against the Reorganized Debtors in the Chapter 11 Cases appended to the Omnibus Objection Procedures Order as Exhibit 1 (the “**Objection Procedures**”). The Objection Notice (as defined in the Objection Procedures) and the Objection Procedures will be served on the holders of the Late-Filed Claims along with this Objection.

⁴ On September 7, 2025, the Reorganized Debtors filed their respective schedules of assets and liabilities (the “**Schedules**”) and statements of financial affairs [Docket Nos. 177–322], pursuant to Bankruptcy Rule 1007.

⁵ Under section 1111(a) of the Bankruptcy Code, scheduled claims are treated as proofs of claim. *See* 11 U.S.C. § 1111(a) (“A proof of claim . . . is deemed filed under section 501 of this title for any claim . . . that appears in the schedules . . . except a claim . . . that is scheduled as disputed, contingent, or unliquidated.”).

⁶ *See* Plan, p. 3 (defining “Claims Objection Deadline” as “ninety (90) days after the Effective Date . . . which dates may be extended pursuant to an order of the Bankruptcy Court upon a motion Filed by the Reorganized Debtors.”).

⁷ The Claims Objection Deadline with respect to claims filed by governmental units is ninety (90) days after the Governmental Bar Date, whereas for claims filed by non-governmental units it is ninety (90) days after the occurrence of the Effective Date.

THE LATE-FILED CLAIMS

14. The Reorganized Debtors' review of the Claims Register allowed them to identify the Late-Filed Claims. This Objection seeks to disallow the Late-Filed Claims in their entirety because each Late-Filed Claim was filed after the applicable Bar Date.

15. As attested to in the *Affidavit of Kenneth Shepard in Support of Debtors' Third Omnibus Objection to Certain Claims* attached hereto as **Exhibit A**, based on their review of the Claims Register, the Reorganized Debtors and their advisors identified each Late-Filed Claim on **Schedule 1** to the Proposed Order as being filed after the occurrence of the applicable Claims Bar Date. To identify the Late-Filed Claims, the Reorganized Debtors:

- (a) reviewed the Claims Register to identify instances in which a Claim was submitted after the applicable Claims Bar Date; and
- (b) determined that there were no agreements or other arrangements between the holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the relevant Claims Bar Date.

16. The Reorganized Debtors hereby request that the Late-Filed Claims be disallowed in their entirety and expunged.

BASIS FOR RELIEF

17. Section 502 of the Bankruptcy Code provides, in pertinent part, that: “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest ... objects.” 11 U.S.C. § 502. Moreover, section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed if “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law” 11 U.S.C. § 502(b)(1). Bankruptcy Rule 3007 provides certain grounds upon which “objections to more than one claim may be joined in a single objection.” FED. R. BANKR. P.

3007(d). This includes objections on the grounds that claims should be disallowed because they “were not timely filed.” FED. R. BANKR. P. 3007(d)(2)(D).

18. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g., In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). A proof of claim loses the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim’s legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id.* Despite this shifting burden during the claim objection process, “the ultimate burden of proof always lies with the claimant.” *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Rev.*, 530 U.S. 15 (2000)).

19. Here, the Court established, pursuant to the Claims Bar Date Order, the Claims Bar Date as the deadline by which creditors were required to file a Proof of Claim conforming to the requirements set forth in the Claims Bar Date Order. The Claims Bar Date Order, in turn, expressly provides that the timely filing of a Proof of Claim was a prerequisite “in order to share in the Debtors’ estates,” Claims Bar Date Order, ¶ 5, and expressly provides that a creditor who failed to timely file a Proof of Claim “shall not be treated as a creditor with respect to such claim for purposes of voting and distribution.” *Id.* at ¶ 20. As set forth above, the Late-Filed Claims were not filed by the applicable Claims Bar Date, and, thus, are subject to disallowance under the express terms of the Claims Bar Date Order.

20. Therefore, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Plan, the Reorganized Debtors respectfully request that the Court enter the Proposed Order granting the relief requested herein.

RESERVATION OF RIGHTS

21. The Reorganized Debtors reserve the right to amend, modify, or supplement this Objection, and to file additional objections to any other Claims (filed or not) that may be asserted against the Reorganized Debtors and their estates. Should one or more of the grounds of objection stated in the Objection be dismissed or overruled, the Reorganized Debtors reserve the right to object to each of the Late-Filed Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

22. Nothing contained herein shall be deemed: (a) an admission as to the amount of, basis for, or validity of any Claim against the Reorganized Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any Claim against, or interest in, the Reorganized Debtors, or their property or estates; (c) a promise or requirement to pay any prepetition Claim; (d) an implication or admission that any particular Claim is of a type specified or defined in this Objection, or any order granting the relief requested by this Objection; (e) an implication, admission, or finding as to (i) the validity, enforceability, or perfection of any interest or encumbrance on the property of the Reorganized Debtors or their estates or (ii) the applicability of any exception or exclusion from property of the estate under section 541 of the Bankruptcy Code or other applicable law; (f) an impairment or waiver of any claims or causes of action which may exist against any entity; or (g) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law.

NOTICE

23. Notice of this Objection will be given to the Claimants, the parties on the Reorganized Debtors' Master Service List, and all parties that have requested or that are required to receive notice pursuant to Bankruptcy Rule 2002. The Reorganized Debtors submit that, under the circumstances, no other or further notice is required.

24. A copy of this Objection is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Claims and Noticing Agent at <https://www.veritaglobal.net/ModivCare>.

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter the Proposed Order sustaining the Objection and granting such other and further relief as may be just and proper.

Dated: March 26, 2026

Respectfully submitted,

/s/ Timothy A. ("Tad") Davidson II

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Co-Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on March 26, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II

Timothy A. ("Tad") Davidson II

Exhibit A

Shepard Declaration

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

-----	X
	:
In re:	: Chapter 11
	:
MODIVCARE INC., <i>et al.</i> ,	: Case No. 25-90309 (ARP)
	:
Reorganized Debtors. ¹	: (Jointly Administered)
	:
-----	X

**AFFIDAVIT OF KENNETH SHEPARD
IN SUPPORT OF REORGANIZED DEBTORS’
THIRD OMNIBUS OBJECTION TO CERTAIN CLAIMS**

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this “*Affidavit*”) in support of the *Reorganized Debtors’ Third Omnibus Objection to Certain Claims* (the “*Objection*”)² pursuant to Rule 3007-1 of the Local Bankruptcy Rules for the Southern District of Texas.

2. I am a senior vice president of finance for the Reorganized Debtors a role that I have served in for approximately two years. I have worked for the Reorganized Debtors for over ten years and in finance for approximately 20 years.

3. I am knowledgeable about, and familiar with, the Reorganized Debtors’ day-to-day operations, business and financial affairs, books and records, and the circumstances that led to the commencement of the Chapter 11 Cases. The facts set forth in this Declaration are based upon

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Objection.

my personal knowledge, my review of relevant documents, information provided to me by employees working under my supervision, my own reasonable inquiry, and/or my discussions with the Reorganized Debtors' other officers, directors, and restructuring advisors, including professionals at Latham & Watkins LLP, Hunton Andrews Kurth LLP, Moelis & Company, FTI Consulting, Inc., and Kurtzman Carson Consultants, LLC d/b/a Verita Global. If called upon to testify, I would testify to the facts set forth in this Affidavit. I am authorized to submit this Affidavit.

OBJECTION TO LATE-FILED CLAIMS

4. Article VII of the Plan empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified certain Late-Filed Claims which they seek the disallowance of in their entirety.

5. The Late-Filed Claims were identified after the Reorganized Debtors:
- (a) reviewed the Claims Register to identify instances in which more a Claim was submitted after the applicable Bar Date; and
 - (b) determined that there were no agreements or other arrangements between the Holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the Claims Bar Date.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 26, 2026

/s/ Kenneth Shepard

Name: Kenneth Shepard

Title: Senior Vice President – Finance
ModivCare Solutions, LLC and its
Reorganized Debtor Affiliates

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	x	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	x	

**ORDER GRANTING REORGANIZED DEBTORS’
THIRD OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**
[Relates to Docket No.]

Upon the objection (the “*Objection*”)² of the Reorganized Debtors seeking entry of an order (this “*Order*”) disallowing the Late-Filed Claims in their entirety as set forth in **Schedule 1** hereto, all as more fully set forth in the Objection; and the Court having reviewed the Objection; and the Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and that no other or further notice is necessary, except as set forth in this Order; and all responses, if any, to the Objection having been withdrawn, resolved, or overruled; and upon the record herein; and upon the record herein; and after due deliberation

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Objection.

thereon; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Objection is in the best interests of the Reorganized Debtors, their estates, their creditors, and other parties in interest, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is GRANTED, as set forth herein.
2. Each Late-Filed Claim listed on Schedule 1 is disallowed and expunged in its entirety.
3. The Claims and Noticing Agent is authorized to update the claims register maintained in the Chapter 11 Cases to reflect the relief granted in this Order.
4. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in the Objection or this Order shall be deemed a waiver of the rights of the Reorganized Debtors to object to any Claim, and shall not constitute an admission of liability by the Reorganized Debtors with respect to any Proof of Claim or application for administrative expenses.
5. Each Late-Filed Claim and the Reorganized Debtors' objections to each Late-Filed Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Late-Filed Claim.
6. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any Claim against the Reorganized Debtors; (b) as a waiver of the Reorganized Debtors' rights to dispute or otherwise object to any Claim on any grounds or basis; or (c) to waive or release any right, claim, defense, or counterclaim of the Reorganized Debtors,

or to estop the Reorganized Debtors from asserting any right, claim, defense, or counterclaim (including setoff).

7. Notice of the Objection as provided therein shall be deemed good and sufficient and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

8. Notwithstanding any applicable Bankruptcy Rules to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon its entry.

9. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Objection.

10. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____, 2026

UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

Late Filed Claims							Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Claim Nature	Claim Amount		
1	3 VETS & COMPANY LLC	ModivCare Inc.	2026	10/30/2025	General Unsecured Priority Secured Admin Priority Total	12,500 - - - \$12,500		
2	Aaron, Peggy	ModivCare Inc.	2212	10/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -		
3	ACTIVE TRANSPORTATION LLC	ModivCare Inc.	1805	10/7/2025	General Unsecured Priority Secured Admin Priority Total	15,475 - - - \$15,475		
4	Administrative Services Cooperative, Inc.	ModivCare Inc.	2362	2/4/2026	General Unsecured Priority Secured Admin Priority Total	- - - 105,611 \$ 105,611		
5	ADP INC	ModivCare Inc.	2043	10/31/2025	General Unsecured Priority Secured Admin Priority Total	2,115 - - - \$ 2,115		
6	ADVANCED FLOORING SOLUTIONS	ModivCare Solutions, LLC	1878	10/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - 17,375 \$ 17,375		
7	ADVANCED FLOORING SOLUTIONS	ModivCare Solutions, LLC	1874	10/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -		
8	Agee, Adrienne	ModivCare Inc.	2428	2/5/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -		
9	AlOmour, Jamal	ModivCare Inc.	1814	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -		
10	Alderman, Timmy	ModivCare Inc.	1733	10/3/2025	General Unsecured Priority Secured Admin Priority Total	693 - - - \$ 693		

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
11	Alle, Amey	ModivCare Inc.	2412	2/4/2026	General Unsecured	3,233
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 3,233
12	Allied Fire & Safety Equipment Co., Inc.	Care Finders Total Care LLC	2058	11/7/2025	General Unsecured	667
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 667
13	AMBULINZ NY, LLC	ModivCare Solutions, LLC	2411	2/4/2026	General Unsecured	867,749
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 867,749
14	American Ground Transportation	ModivCare Solutions, LLC	2097	11/17/2025	General Unsecured	397,872
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 397,872
15	American Medical Response Ambulance Service, Inc.	ModivCare Inc.	2310	1/28/2026	General Unsecured	303,217
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 303,217
16	American Medical Response Mid-Atlantic, Inc.	ModivCare Inc.	2311	1/28/2026	General Unsecured	66,607
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 66,607
17	American Medical Response of Inland Empire	ModivCare Inc.	2312	1/28/2026	General Unsecured	85,431
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 85,431
18	American Medical Response of New York, LLC	ModivCare Inc.	2313	1/28/2026	General Unsecured	36,557
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 36,557
19	American Medical Response of Southern California	ModivCare Inc.	2314	1/28/2026	General Unsecured	142,745
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 142,745
20	American Medical Response West	ModivCare Inc.	2315	1/28/2026	General Unsecured	436,968
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 436,968

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
21	Antigua, Karin	ModivCare Solutions, LLC	1854	10/8/2025	General Unsecured Priority Secured Admin Priority Total	77 - - - \$ 77
22	Archuleta, Devon L	ModivCare Inc.	1837	10/8/2025	General Unsecured Priority Secured Admin Priority Total	3,219 - - - \$ 3,219
23	Armada, Anthony	ModivCare Solutions, LLC	2132	11/25/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
24	Ashford, Janet	ModivCare Inc.	2262	1/13/2026	General Unsecured Priority Secured Admin Priority Total	213 - - - \$ 213
25	Atherton, April	ModivCare Inc.	2225	12/28/2025	General Unsecured Priority Secured Admin Priority Total	250 - - - \$ 250
26	Atlantic/Palm Beach Ambulance, Inc.	ModivCare Inc.	2316	1/28/2026	General Unsecured Priority Secured Admin Priority Total	1,699 - - - \$ 1,699
27	Avila, Claudia	ModivCare Inc.	1906	10/14/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
28	B and S Properties	ModivCare Inc.	1846	10/8/2025	General Unsecured Priority Secured Admin Priority Total	14,912 - - - \$ 14,912
29	Baker Hoster LLP	ModivCare Solutions, LLC	2387	2/4/2026	General Unsecured Priority Secured Admin Priority Total	- - - 60,000 \$ 60,000
30	Bankes, Brooke	CareGivers America Home Health Services, LLC	2238	1/6/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
31	Barczak, Cassie	ModivCare Solutions, LLC	2175	12/11/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
32	Baxter, Tommie	ModivCare Solutions, LLC	1740	10/3/2025	General Unsecured Priority Secured Admin Priority Total	55 - - \$ 55
33	Bell, Donna	ModivCare Inc.	1751	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
34	Benally, Delores Jane	ModivCare Inc.	2127	11/24/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
35	Benjamin, Torrence	ModivCare Solutions, LLC	2042	11/4/2025	General Unsecured Priority Secured Admin Priority Total	1,000 - - \$ 1,000
36	Bennett, Phyllis	ModivCare Inc.	2008	10/27/2025	General Unsecured Priority Secured Admin Priority Total	- - 350,000 \$ 350,000
37	Berkheimer, Melissa	CareGivers America Home Health Services, LLC	1836	10/8/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
38	Betts, Suzanne (Administrator of the Estate of Frances Betts, Deceased)	ModivCare Inc.	2319	1/28/2026	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
39	Bhutto, Kamran	ModivCare Inc.	2019	10/29/2025	General Unsecured Priority Secured Admin Priority Total	866 - - \$ 866
40	Biamonte Goldman, Susan	ModivCare Solutions, LLC	2296	1/25/2026	General Unsecured Priority Secured Admin Priority Total	- 5,000 - \$ 5,000

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
41	Bivins, Joseph	ModivCare Inc.	1706	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
42	Bland, Bobby	ModivCare Inc.	1972	10/20/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
43	Blankenship, Chad	ModivCare Inc.	2126	11/24/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
44	Blythe Ambulance Service	ModivCare Inc.	2321	1/28/2026	General Unsecured Priority Secured Admin Priority Total	1,272 - - \$ 1,272
45	Bonamou, Angeline	ModivCare Inc.	2244	1/12/2026	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
46	Bozinta, Justin	ModivCare Inc.	2037	11/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
47	Bradley, Jennifer	ModivCare Inc.	2431	2/5/2026	General Unsecured Priority Secured Admin Priority Total	192 - - \$ 192
48	Brady, Kestlea	ModivCare Inc.	2280	1/19/2026	General Unsecured Priority Secured Admin Priority Total	75 - - 800 \$ 875
49	Brennen, Byron	ModivCare Inc.	2014	10/28/2025	General Unsecured Priority Secured Admin Priority Total	5,000 - - \$ 5,000
50	Brinegar, James Travis	ModivCare Inc.	1761	10/5/2025	General Unsecured Priority Secured Admin Priority Total	398 - - \$ 398

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
51	Broward Ambulance, Inc.	ModivCare Inc.	2329	1/28/2026	General Unsecured Priority Secured Admin Priority Total	1,148 - - \$ 1,148
52	Brown, Patti	ModivCare Inc.	2283	1/20/2026	General Unsecured Priority Secured Admin Priority Total	1,400 - - \$ 1,400
53	Burns, Imogene	Guardian Medical Monitoring, LLC	1973	10/20/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
54	Burns, Kovey	ModivCare Inc.	2227	12/29/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
55	Burton, Tashica	ModivCare Inc.	1930	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
56	Byerly, Crawford	ModivCare Inc.	2307	1/27/2026	General Unsecured Priority Secured Admin Priority Total	82,850 17,150 - \$ 100,000
57	Byrd, Aulinda	ModivCare Inc.	1775	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
58	Cales, Jewel	ModivCare Inc.	1945	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
59	Callahan, Felicia	ModivCare Inc.	2066	11/9/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
60	CALSTAR Air Medical Services LLC	ModivCare Inc.	2422	2/5/2026	General Unsecured Priority Secured Admin Priority Total	45,052 - - \$ 45,052

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
61	Careficient, Inc.	Multicultural Home Care Inc.	1870	10/10/2025	General Unsecured	534
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 534
62	Carestar, LLC	ModivCare Inc.	2334	1/30/2026	General Unsecured	42,099
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$42,099
63	Carl, Nancy	CareGivers America Home Health Services, LLC	1840	10/8/2025	General Unsecured	-
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ -
64	Carrejo, Valerie	ModivCare Solutions, LLC	2117	11/22/2025	General Unsecured	1
					Priority	8,859
					Secured	-
					Admin Priority	-
					Total	\$ 8,860
65	Carrejo, Valerie	ModivCare Inc.	2230	12/31/2025	General Unsecured	1
					Priority	8,859
					Secured	-
					Admin Priority	-
					Total	\$ 8,860
66	Carson, Chirsty	ModivCare Inc.	2353	2/3/2026	General Unsecured	150
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 150
67	Castillo Rodriguez, Milagros	ModivCare Inc.	1697	10/2/2025	General Unsecured	-
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ -
68	Castro, Nahum	ModivCare Inc.	2289	1/21/2026	General Unsecured	920
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 920
69	Caudill, Maria	ModivCare Inc.	2247	1/12/2026	General Unsecured	43
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 43
70	Cellco Partnership d/b/a Verizon Wireless	ModivCare Inc.	1849	10/7/2025	General Unsecured	58,310
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 58,310

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
71	Centurion Transportation LLC	ModivCare Inc.	2113	11/20/2025	General Unsecured Priority Secured Admin Priority Total	- - - 384 \$ 384
72	Certify My Company	ModivCare Inc.	2425	2/5/2026	General Unsecured Priority Secured Admin Priority Total	11,943 - - - \$ 11,943
73	CharKhchian, Shooshanik	ModivCare Inc.	1914	10/13/2025	General Unsecured Priority Secured Admin Priority Total	5,000,000 - - - \$ 5,000,000
74	Charlip, Edward	ModivCare Inc.	1842	10/8/2025	General Unsecured Priority Secured Admin Priority Total	1,035 - - - \$ 1,035
75	CHAUFFEURED SENIORS LLC	ModivCare Solutions, LLC	1767	10/5/2025	General Unsecured Priority Secured Admin Priority Total	2,000 - - - \$ 2,000
76	Chavez, Felicia Marie	ModivCare Inc.	2177	12/11/2025	General Unsecured Priority Secured Admin Priority Total	- - 8,000 - \$ 8,000
77	Chen, Yun	ModivCare Inc.	2248	1/12/2026	General Unsecured Priority Secured Admin Priority Total	30 - - - \$ 30
78	Chi-wai, Lui	ModivCare Inc.	2011	10/24/2025	General Unsecured Priority Secured Admin Priority Total	- - - 13,000 \$ 13,000
79	Citizens Community Transport, LLC	ModivCare Inc.	2301	1/26/2026	General Unsecured Priority Secured Admin Priority Total	6,081 - - - \$ 6,081
80	Clark, Betty	ModivCare Inc.	2241	1/12/2026	General Unsecured Priority Secured Admin Priority Total	506 - - - \$ 506

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
81	Clark, Kenyatta	ModivCare Inc.	2016	10/28/2025	General Unsecured Priority Secured Admin Priority Total	330 - - - \$ 330
82	Clay, Hannah	ModivCare Inc.	2434	2/8/2026	General Unsecured Priority Secured Admin Priority Total	- - 650,654 - \$ 650,654
83	Clear, Elana Jones	ModivCare Inc.	2102	11/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
84	Coastal Medical Transport Inc	ModivCare Inc.	2040	11/3/2025	General Unsecured Priority Secured Admin Priority Total	56,034 - - - \$ 56,034
85	Cofield, Cheryl	ModivCare Inc.	1887	10/11/2025	General Unsecured Priority Secured Admin Priority Total	200 - - - \$ 200
86	Colker, Jean	ModivCare Inc.	1796	10/6/2025	General Unsecured Priority Secured Admin Priority Total	50,000 - - - \$ 50,000
87	COLOGIXUS, INC.	Valued Relationships, Inc.	2298	1/26/2026	General Unsecured Priority Secured Admin Priority Total	6,539 - - - \$ 6,539
88	COMFORT HEALTHCARE SOLUTIONS LLC	ModivCare Solutions, LLC	1940	10/16/2025	General Unsecured Priority Secured Admin Priority Total	35,000 - - - \$ 35,000
89	Conrady Arrington, Susan	ModivCare Inc.	1879	10/10/2025	General Unsecured Priority Secured Admin Priority Total	72 - - - \$ 72
90	Cooper, Scarlett	ModivCare Inc.	2416	2/5/2026	General Unsecured Priority Secured Admin Priority Total	3,039 - - - \$ 3,039

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
91	Copeland, Tamika J	ModivCare Inc.	2020	10/29/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
92	Cordova, Angie	ModivCare Inc.	1776	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
93	Corona, Patricia	ModivCare Inc.	1960	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
94	Corrigan, Patricia	ModivCare Inc.	1759	10/4/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
95	Courtney, Patricia	ModivCare Inc.	2274	1/19/2026	General Unsecured Priority Secured Admin Priority Total	160 - - \$ 160
96	Crump, Melodia	ModivCare Solutions, LLC	1992	10/24/2025	General Unsecured Priority Secured Admin Priority Total	- 200 - \$ 200
97	CyraCom International, Inc.	VRI Intermediate Holdings, LLC	2157	12/2/2025	General Unsecured Priority Secured Admin Priority Total	6,259 - - \$ 6,259
98	Dahl, Richard A	ModivCare Inc.	1819	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
99	Daniels Martin, Lyndsey	ModivCare Inc.	1886	10/11/2025	General Unsecured Priority Secured Admin Priority Total	4 - - 595 \$ 599
100	Daris, Lacie	ModivCare Inc.	2001	10/27/2025	General Unsecured Priority Secured Admin Priority Total	210 - - \$ 210

Appendix 2

Objection Procedures

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

----- X
In re: : Chapter 11
MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
Reorganized Debtors.¹ : (Jointly Administered)
----- X

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors² may file omnibus objections (each, an “*Omnibus Objection*”) to Claims on the grounds that such Claims, in part or in whole:

- (a) are inconsistent with the Reorganized Debtors’ books and records;
- (b) fail to specify the asserted Claim amount (or only list the Claim amount as “unliquidated”);
- (c) seek recovery of amounts for which the Reorganized Debtors are not liable;
- (d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors’ Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;
- (e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;
- (f) fail to specify a Reorganized Debtor against which the Claim is asserted;

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the “*Motion*”).

- (g) are disallowed pursuant to section 502 of the Bankruptcy Code;
- (h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;
- (i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;
- (j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the “*Withdrawal Form*”) available on the Claims and Noticing Agent’s website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);
- (k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;
- (l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors’ insurers (in which case the details of payments must be included with the Omnibus Objection); or
- (m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the rescission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors’ objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

- (a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;
- (b) the asserted amount of the Claim;
- (c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;
- (d) a summary of the grounds for the objection;
- (e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and
- (f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "**Order**") as Exhibit 2 (the "**Objection Notice**"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

- (a) adequately describe the nature of the objection;
- (b) inform Holders that their rights may be affected by the objection;
- (c) describe the procedures for filing a written response (each, a "**Response**") to the objection, including all relevant dates and deadlines related thereto;
- (d) identify the hearing date, if applicable, and related information; and
- (e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "**Response Procedures**") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and
- (c) the following contact information for the responding party:
 - (i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov/>.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit Q

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

----- X
 :
 In re: : Chapter 11
 :
 MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

NOTICE OF REORGANIZED DEBTORS’ FOURTH OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Claimants receiving this notice (this “Notice”) should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by April 25, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the “*Reorganized Debtors*”) have filed the Objection attached hereto as **Appendix 1** (the “*Omnibus Objection*”) to your claim(s).²

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf is deficient because: the Proof of Claim was not timely filed by the deadline set by the Court.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Omnibus Objection.

disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "**Response**") with the United States Bankruptcy Court for the Southern District of Texas (the "**Court**") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **April 25, 2026, at 4:00 p.m. (prevailing Central Time)**.

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at <https://www.txs.uscourts.gov> or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **April 25, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to **disallow and expunge** your Claim(s) based on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in the Chapter 11 Cases (the "**Objection Procedures**").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures requires that each Response must contain the following information (at a minimum):

a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

the following contact information for the responding party:

the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **April 25, 2026**, at 4:00 p.m. (prevailing Central Time) unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov>. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

----- X
 :
 In re: : Chapter 11
 :
 MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

**REORGANIZED DEBTORS' FOURTH
OMNIBUS OBJECTION TO CERTAIN CLAIMS (LATE-FILED CLAIMS)**

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THE BANKRUPTCY CASE. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED WITHOUT A HEARING.

TO THE CLAIMANTS WHOSE CLAIMS ARE SUBJECT TO THIS OBJECTION:

YOUR SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND ANY FURTHER OBJECTIONS THAT MAY BE FILED IN THE CHAPTER 11 CASES.

THE RELIEF SOUGHT IN THIS OBJECTION IS WITHOUT PREJUDICE TO THE RIGHTS OF THE REORGANIZED DEBTORS AND THEIR ESTATES OR OTHER PARTIES IN INTEREST TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED HEREIN AND OTHER CLAIMS FILED IN THE CHAPTER 11 CASES.

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

The above-captioned reorganized debtors (prior to the Effective Date,² collectively, the “*Debtors*” and after the Effective Date, collectively, the “*Reorganized Debtors*”) respectfully state the following in support of this omnibus claims objection (this “*Objection*”).

RELIEF REQUESTED

1. By this Objection, the Reorganized Debtors seek entry of an order substantially in the form attached hereto (the “*Proposed Order*”) disallowing the claims listed on **Schedule 1** (the “*Late-Filed Claims*”) to the Proposed Order in their entirety because each of the Late-Filed Claims was filed after the applicable Claims Bar Date.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the “*Court*”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution.

3. Each of the Late-Filed Claims that are the subject of this Objection were asserted on proof of claim forms (each a “*Proof of Claim*” and collectively the “*Claim Forms*”) filed with the Claims and Noticing Agent (as defined below). By seeking recovery from the Reorganized Debtors’ estates based on the filing of a Proof of Claim, the holders of the Late-Filed Claims (each a “*Claimant*” and collectively the “*Claimants*”) have submitted to the Court’s jurisdiction over this matter.

4. Venue of the Chapter 11 Cases and this Objection in this district is proper under 28 U.S.C. §§ 1408 and 1409.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1055, Ex. A] (together with all supplemental or supporting documentation related thereto, the “*Plan*”), as applicable.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “**Bankruptcy Local Rules**”), and the Procedures for Complex Cases in the Southern District of Texas.

BACKGROUND

6. On August 20, 2025, the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered, for procedural purposes only, pursuant to Rule 1015(b) of the Bankruptcy Rules and Rule 1015-1 of the Bankruptcy Local Rules. The factual background regarding the Debtors, including their business, their capital structure, and the events leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First-Day Relief* [Docket No. 14].

7. On December 15, 2025, the Court entered the Confirmation Order³ which, among other things, confirmed the Plan. The Effective Date occurred on December 29, 2025.

CLAIMS RECONCILIATION PROCESS

8. On August 21, 2025, the Court entered the *Order Establishing (A) Bar Dates and Related Procedures for Filing Proofs of Claim; (B) Approving the Form and Manner of Notice Thereof; and (C) Granting Related Relief* [Docket No. 66] (the “**Claims Bar Date Order**”) setting, *inter alia*, October 1, 2025, as the deadline for non-governmental creditors and interest holders to file claims in the Chapter 11 Cases (the “**General Bar Date**”).

³ Docket No. 1055.

9. The deadline for all governmental units asserting a “claim” (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose on or prior to the Petition Date to file a Proof of Claim on account of such claim was February 16, 2026, at 5:00 p.m. (prevailing Central Time) (the “**Governmental Bar Date**” and together with the General Bar Date, as applicable depending on whether the claimant is a governmental unit or non-governmental unit, the “**Claims Bar Date**”).

10. The Claims Bar Date Order establishes certain requirements that a filed claim must satisfy to be considered valid. A filed claim must, among other things, “set forth with specificity the legal and factual basis for the alleged claim,” and “include supporting documentation or an explanation as to why such documentation is not available.” Claims Bar Date Order, ¶ 7. If such filed claims are not properly submitted prior to the Claims Bar Date, the Claims Bar Date Order provides that the relevant claimant “shall not be treated as a creditor with respect to such claim for purposes of voting and **distribution**.” *Id.* at ¶ 20 (emphasis added).

11. On August 23, 2025, the Reorganized Debtors’ claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global (the “**Claims and Noticing Agent**”), mailed notice of the Claims Bar Date (the “**Bar Date Notice**”) to potential claimants in accordance with the procedures set forth in the Claims Bar Date Order. *See Affidavit of Service* [Docket No. 98]. Also, as certified at Docket No. 142, in accordance with the Claims Bar Date Order, the Reorganized Debtors published the Bar Date Notice in *The New York Times* on August 26, 2025. *See Affidavit of Publication of the Notice of Deadline for the Filing of Proofs of Claim, Including for Claims Asserted Under Section 503(b)(9) of the Bankruptcy Code in the New York Times* [Docket No. 142].

12. The Reorganized Debtors also listed numerous claims in their Schedules⁴ (such claims, along with the claims asserted in each proof of claim filed in the Chapter 11 Cases, collectively, the “**Claims**”), some of which have been satisfied under the authority granted to the Reorganized Debtors pursuant to certain “first day” orders and other orders entered in these Chapter 11 Cases. A database of all Claims is being maintained by the Reorganized Debtors’ Claims and Noticing Agent (the “**Claims Register**”).⁵ Pursuant to the Plan, the Claims Objection Deadline is currently, subject to the Reorganized Debtors’ right to seek a further extension of such deadline in accordance with the Plan,⁶ March 29, 2026 (*i.e.*, the date that is ninety (90) days after the occurrence of the Effective Date).⁷

13. On February 19, 2026, the Court entered the *Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1313] (the “**Omnibus Objection Procedures Order**”) approving the procedures for filing and resolving omnibus objections to Claims asserted against the Reorganized Debtors in the Chapter 11 Cases appended to the Omnibus Objection Procedures Order as Exhibit 1 (the “**Objection Procedures**”). The Objection Notice (as defined in the Objection Procedures) and the Objection Procedures will be served on the holders of the Late-Filed Claims along with this Objection.

⁴ On September 7, 2025, the Reorganized Debtors filed their respective schedules of assets and liabilities (the “**Schedules**”) and statements of financial affairs [Docket Nos. 177–322], pursuant to Bankruptcy Rule 1007.

⁵ Under section 1111(a) of the Bankruptcy Code, scheduled claims are treated as proofs of claim. *See* 11 U.S.C. § 1111(a) (“A proof of claim . . . is deemed filed under section 501 of this title for any claim . . . that appears in the schedules . . . except a claim . . . that is scheduled as disputed, contingent, or unliquidated.”).

⁶ *See* Plan, p. 3 (defining “Claims Objection Deadline” as “ninety (90) days after the Effective Date . . . which dates may be extended pursuant to an order of the Bankruptcy Court upon a motion Filed by the Reorganized Debtors.”).

⁷ The Claims Objection Deadline with respect to claims filed by governmental units is ninety (90) days after the Governmental Bar Date, whereas for claims filed by non-governmental units it is ninety (90) days after the occurrence of the Effective Date.

THE LATE-FILED CLAIMS

14. The Reorganized Debtors' review of the Claims Register allowed them to identify the Late-Filed Claims. This Objection seeks to disallow the Late-Filed Claims in their entirety because each Late-Filed Claim was filed after the applicable Bar Date.

15. As attested to in the *Affidavit of Kenneth Shepard in Support of Debtors' Fourth Omnibus Objection to Certain Claims* attached hereto as **Exhibit A**, based on their review of the Claims Register, the Reorganized Debtors and their advisors identified each Late-Filed Claim on **Schedule 1** to the Proposed Order as being filed after the occurrence of the applicable Claims Bar Date. To identify the Late-Filed Claims, the Reorganized Debtors:

- (a) reviewed the Claims Register to identify instances in which a Claim was submitted after the applicable Claims Bar Date; and
- (b) determined that there were no agreements or other arrangements between the holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the relevant Claims Bar Date.

16. The Reorganized Debtors hereby request that the Late-Filed Claims be disallowed in their entirety and expunged.

BASIS FOR RELIEF

17. Section 502 of the Bankruptcy Code provides, in pertinent part, that: “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest ... objects.” 11 U.S.C. § 502. Moreover, section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed if “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law” 11 U.S.C. § 502(b)(1). Bankruptcy Rule 3007 provides certain grounds upon which “objections to more than one claim may be joined in a single objection.” FED. R. BANKR. P.

3007(d). This includes objections on the grounds that claims should be disallowed because they “were not timely filed.” FED. R. BANKR. P. 3007(d)(2)(D).

18. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g., In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). A proof of claim loses the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim’s legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id.* Despite this shifting burden during the claim objection process, “the ultimate burden of proof always lies with the claimant.” *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Rev.*, 530 U.S. 15 (2000)).

19. Here, the Court established, pursuant to the Claims Bar Date Order, the Claims Bar Date as the deadline by which creditors were required to file a Proof of Claim conforming to the requirements set forth in the Claims Bar Date Order. The Claims Bar Date Order, in turn, expressly provides that the timely filing of a Proof of Claim was a prerequisite “in order to share in the Debtors’ estates,” Claims Bar Date Order, ¶ 5, and expressly provides that a creditor who failed to timely file a Proof of Claim “shall not be treated as a creditor with respect to such claim for purposes of voting and distribution.” *Id.* at ¶ 20. As set forth above, the Late-Filed Claims were not filed by the applicable Claims Bar Date, and, thus, are subject to disallowance under the express terms of the Claims Bar Date Order.

20. Therefore, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Plan, the Reorganized Debtors respectfully request that the Court enter the Proposed Order granting the relief requested herein.

RESERVATION OF RIGHTS

21. The Reorganized Debtors reserve the right to amend, modify, or supplement this Objection, and to file additional objections to any other Claims (filed or not) that may be asserted against the Reorganized Debtors and their estates. Should one or more of the grounds of objection stated in the Objection be dismissed or overruled, the Reorganized Debtors reserve the right to object to each of the Late-Filed Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

22. Nothing contained herein shall be deemed: (a) an admission as to the amount of, basis for, or validity of any Claim against the Reorganized Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any Claim against, or interest in, the Reorganized Debtors, or their property or estates; (c) a promise or requirement to pay any prepetition Claim; (d) an implication or admission that any particular Claim is of a type specified or defined in this Objection, or any order granting the relief requested by this Objection; (e) an implication, admission, or finding as to (i) the validity, enforceability, or perfection of any interest or encumbrance on the property of the Reorganized Debtors or their estates or (ii) the applicability of any exception or exclusion from property of the estate under section 541 of the Bankruptcy Code or other applicable law; (f) an impairment or waiver of any claims or causes of action which may exist against any entity; or (g) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law.

NOTICE

23. Notice of this Objection will be given to the Claimants, the parties on the Reorganized Debtors' Master Service List, and all parties that have requested or that are required to receive notice pursuant to Bankruptcy Rule 2002. The Reorganized Debtors submit that, under the circumstances, no other or further notice is required.

24. A copy of this Objection is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Claims and Noticing Agent at <https://www.veritaglobal.net/ModivCare>.

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter the Proposed Order sustaining the Objection and granting such other and further relief as may be just and proper.

Dated: March 26, 2026

Respectfully submitted,

/s/ Timothy A. ("Tad") Davidson II

HUNTON ANDREWS KURTH LLP

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Co-Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on March 26, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II

Timothy A. ("Tad") Davidson II

Exhibit A

Shepard Declaration

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

-----	X	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
-----	X	

**AFFIDAVIT OF KENNETH SHEPARD
IN SUPPORT OF REORGANIZED DEBTORS’
FOURTH OMNIBUS OBJECTION TO CERTAIN CLAIMS**

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this “*Affidavit*”) in support of the *Reorganized Debtors’ Fourth Omnibus Objection to Certain Claims* (the “*Objection*”)² pursuant to Rule 3007-1 of the Local Bankruptcy Rules for the Southern District of Texas.

2. I am a senior vice president of finance for the Reorganized Debtors a role that I have served in for approximately two years. I have worked for the Reorganized Debtors for over ten years and in finance for approximately 20 years.

3. I am knowledgeable about, and familiar with, the Reorganized Debtors’ day-to-day operations, business and financial affairs, books and records, and the circumstances that led to the commencement of the Chapter 11 Cases. The facts set forth in this Declaration are based upon

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Objection.

my personal knowledge, my review of relevant documents, information provided to me by employees working under my supervision, my own reasonable inquiry, and/or my discussions with the Reorganized Debtors' other officers, directors, and restructuring advisors, including professionals at Latham & Watkins LLP, Hunton Andrews Kurth LLP, Moelis & Company, FTI Consulting, Inc., and Kurtzman Carson Consultants, LLC d/b/a Verita Global. If called upon to testify, I would testify to the facts set forth in this Affidavit. I am authorized to submit this Affidavit.

OBJECTION TO LATE-FILED CLAIMS

4. Article VII of the Plan empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified certain Late-Filed Claims which they seek the disallowance of in their entirety.

5. The Late-Filed Claims were identified after the Reorganized Debtors:
- (a) reviewed the Claims Register to identify instances in which more a Claim was submitted after the applicable Bar Date; and
 - (b) determined that there were no agreements or other arrangements between the Holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the Claims Bar Date.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 26, 2026

/s/ Kenneth Shepard

Name: Kenneth Shepard

Title: Senior Vice President – Finance
ModivCare Solutions, LLC and its
Reorganized Debtor Affiliates

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	x	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	x	

**ORDER GRANTING REORGANIZED DEBTORS’
FOURTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM
[Relates to Docket No.]**

Upon the objection (the “*Objection*”)² of the Reorganized Debtors seeking entry of an order (this “*Order*”) disallowing the Late-Filed Claims in their entirety as set forth in Schedule 1 hereto, all as more fully set forth in the Objection; and the Court having reviewed the Objection; and the Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and that no other or further notice is necessary, except as set forth in this Order; and all responses, if any, to the Objection having been withdrawn, resolved, or overruled; and upon the record herein; and upon the record herein; and after due deliberation

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Objection.

thereon; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Objection is in the best interests of the Reorganized Debtors, their estates, their creditors, and other parties in interest, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is GRANTED, as set forth herein.
2. Each Late-Filed Claim listed on Schedule 1 is disallowed and expunged in its entirety.
3. The Claims and Noticing Agent is authorized to update the claims register maintained in the Chapter 11 Cases to reflect the relief granted in this Order.
4. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in the Objection or this Order shall be deemed a waiver of the rights of the Reorganized Debtors to object to any Claim, and shall not constitute an admission of liability by the Reorganized Debtors with respect to any Proof of Claim or application for administrative expenses.
5. Each Late-Filed Claim and the Reorganized Debtors' objections to each Late-Filed Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Late-Filed Claim.
6. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any Claim against the Reorganized Debtors; (b) as a waiver of the Reorganized Debtors' rights to dispute or otherwise object to any Claim on any grounds or basis; or (c) to waive or release any right, claim, defense, or counterclaim of the Reorganized Debtors,

or to estop the Reorganized Debtors from asserting any right, claim, defense, or counterclaim (including setoff).

7. Notice of the Objection as provided therein shall be deemed good and sufficient and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

8. Notwithstanding any applicable Bankruptcy Rules to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon its entry.

9. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Objection.

10. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____, 2026

UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

Late Filed Claims 101 - 200						Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Claim Nature	Claim Amount	
101	Davis, Betty	ModivCare Inc.	2039	11/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -	
102	Devenport, Gwen	ModivCare Inc.	1710	10/2/2025	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500	
103	Diaz, Ivette	ModivCare Inc.	1881	10/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -	
104	Dickens, Marlon	ModivCare Inc.	2217	12/23/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -	
105	Dickens, Nasir	ModivCare Inc.	2265	1/14/2026	General Unsecured Priority Secured Admin Priority Total	2,454 - - - \$ 2,454	
106	Dingle, Gabrielle	ModivCare Solutions, LLC	1872	10/11/2025	General Unsecured Priority Secured Admin Priority Total	1,000 - - - \$ 1,000	
107	Dodge, Melissa	ModivCare Inc.	2148	11/29/2025	General Unsecured Priority Secured Admin Priority Total	200 - - - \$ 200	
108	Donaldson, Mark P	ModivCare Inc.	2246	1/12/2026	General Unsecured Priority Secured Admin Priority Total	100 - - - \$ 100	
109	Dorado, Maria	ModivCare Inc.	1815	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - 300 \$ 300	
110	Dowling, Kelly	ModivCare Inc.	2136	11/25/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -	

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
111	Downs, Rachel A	ModivCare Inc.	2281	1/20/2026	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ -
112	Drago, Mary	ModivCare Inc.	2219	12/18/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ -
113	Dubois, Brenda	ModivCare Inc.	2266	1/15/2026	General Unsecured Priority Secured Admin Priority Total	- 250 - -	\$ 250
114	Duran, Marybeth (as Personal Representative of the Wrongful Death Estate of Richard Chavez)	ModivCare Solutions, LLC	2140	11/25/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	5,000,000 \$ 5,000,000
115	E AND K TN LLC	ModivCare Inc.	2297	1/25/2026	General Unsecured Priority Secured Admin Priority Total	- - - -	6,781 \$ 6,781
116	Edwards, Tahirah H	ModivCare Inc.	1779	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	-
117	Ellis, Tiffany M	ModivCare Solutions, LLC	1711	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ -
118	Estate of Charles Edward Whaley	ModivCare Inc.	2243	1/12/2026	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ -
119	Estate of Janet Williams	ModivCare Inc.	2185	12/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	250,000 \$ 250,000
120	EVANS TRANS LLC	ModivCare Inc.	1984	10/22/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	15,000 \$ 15,000

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
131	First-Citizens Bank & Trust Company	ModivCare Inc.	2206	12/16/2025	General Unsecured	43,383
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$43,383
132	First-Citizens Bank & Trust Company	ModivCare Inc.	2207	12/16/2025	General Unsecured	4,313
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$4,313
133	First-Citizens Bank & Trust Company	ModivCare Inc.	2208	12/16/2025	General Unsecured	7,575
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$7,575
134	Fisher and Phillips LLP	ModivCare Inc.	2030	10/31/2025	General Unsecured	4,128
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$4,128
135	FIVE9 Inc	Valued Relationships, Inc.	1868	10/10/2025	General Unsecured	-
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$11,890
136	Florez, Sandra	ModivCare Inc.	2107	11/18/2025	General Unsecured	-
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$-
137	Forbes-Proffit, Amber	ModivCare Solutions, LLC	2028	10/30/2025	General Unsecured	875
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$875
138	Fragomen, Del Rey, Bensen and Loewy, LLP	ModivCare Solutions, LLC	2060	11/7/2025	General Unsecured	34,360
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$34,360
139	Frangella, Charles	ModivCare Inc.	1777	10/6/2025	General Unsecured	1,360
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$1,360
140	Frank, Trevor	ModivCare Inc.	1757	10/4/2025	General Unsecured	-
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$-

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
141	Fredriksen, Paul A	ModivCare Solutions, LLC	1975	10/20/2025	General Unsecured Priority Secured Admin Priority Total	- - - 1,109 \$ 1,109
142	Frith, Bonnie	ModivCare Inc.	1713	10/2/2025	General Unsecured Priority Secured Admin Priority Total	200 - - - \$ 200
143	Fuller, Lakesha O	ModivCare Inc.	1737	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - 4,500 - \$ 4,500
144	Garcia Pena, Victor	ModivCare Inc.	2287	1/20/2026	General Unsecured Priority Secured Admin Priority Total	1,065 - - - \$ 1,065
145	Garcia, Eileen	ModivCare Inc.	2170	12/8/2025	General Unsecured Priority Secured Admin Priority Total	650 20,950 - - \$ 21,600
146	Garcia, Jeannie	ModivCare Inc.	2052	11/5/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
147	Garcia, Mendy	ModivCare Inc.	1768	10/6/2025	General Unsecured Priority Secured Admin Priority Total	11,787 - - - \$ 11,787
148	Gartner, Inc.	ModivCare Solutions, LLC	2231	1/2/2026	General Unsecured Priority Secured Admin Priority Total	135,523 - - - \$ 135,523
149	Gervasi, Diane	ModivCare Inc.	2270	1/16/2026	General Unsecured Priority Secured Admin Priority Total	200,000 - - - \$ 200,000
150	Gibson, Alkeshia	ModivCare Solutions, LLC	1844	10/8/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
151	Gilliam, Doris	ModivCare Inc.	1864	10/9/2025	General Unsecured Priority Secured Admin Priority Total	- - - 25,000 \$ 25,000 56,000
152	Global Transportation Inc	ModivCare Inc.	1811	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ 56,000
153	Glover Shell, Marshea Dentise	ModivCare Inc.	1825	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - - -
154	Goforth, Erin	ModivCare Inc.	2051	11/4/2025	General Unsecured Priority Secured Admin Priority Total	225 - - - \$ -
155	Gomez, Edelmira	ModivCare Inc.	1755	10/4/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ 225
156	Goschke, Sonya	ModivCare Solutions, LLC	1803	10/7/2025	General Unsecured Priority Secured Admin Priority Total	46 - - - \$ 46
157	Grant, David	ModivCare Inc.	1695	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
158	Grant, Shelby J	ModivCare Inc.	1712	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
159	Gravely, Brenda	ModivCare Solutions, LLC	1822	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- 3,356 - - \$ 3,356
160	Gray, Eric S	ModivCare Inc.	2120	11/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
161	Gray, Evelyn	ModivCare Inc.	1732	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
162	Great Blue Research, Inc.	ModivCare Solutions, LLC	1704	10/2/2025	General Unsecured Priority Secured Admin Priority Total	7,097 - - - \$ 7,097
163	Greene, Thomas	ModivCare Inc.	1792	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
164	Guardian Flight LLC	ModivCare Inc.	2421	2/5/2026	General Unsecured Priority Secured Admin Priority Total	- - - - 6,317
165	Gunn, James	ModivCare Inc.	1738	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ 6,317
166	Hale, Stephanie	ModivCare Solutions, LLC	1976	10/20/2025	General Unsecured Priority Secured Admin Priority Total	- - - - 12,097
167	Hamilton, Chinmema	ModivCare Inc.	1895	10/14/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ 12,097
168	Hanchey III, Etwood L	ModivCare Inc.	1869	10/10/2025	General Unsecured Priority Secured Admin Priority Total	- - 4,080 - - \$ 4,080
169	Haney, Tywanda	ModivCare Inc.	1936	10/16/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
170	Hargrave, Vivian	ModivCare Inc.	1694	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
171	Hartan, Eric M	ModivCare Inc.	1786	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- 1,275 - - \$ 1,275
172	Harris, Jason	ModivCare Inc.	1702	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
173	Harris, Jason Sr	ModivCare Inc.	1705	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
174	Harrison, Selina	CareGivers America Home Health Services, LLC	2223	12/28/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
175	Hart, Amy	ModivCare Solutions, LLC	2088	11/13/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
176	Hawkins, Lindsay	ModivCare Inc.	2282	1/20/2026	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
177	Hayes, Mary	Guardian Medical Monitoring, LLC	1964	10/20/2025	General Unsecured Priority Secured Admin Priority Total	258 - - - \$ 258
178	Haynes, Tralize K	ModivCare Solutions, LLC	1855	10/8/2025	General Unsecured Priority Secured Admin Priority Total	15,000 - - - \$ 15,000
179	Heatley, Carolyn	ModivCare Inc.	1801	10/6/2025	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
180	Heatley, Ordley	ModivCare Inc.	1802	10/6/2025	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
181	Helms, Oletta	ModivCare Inc.	2105	11/18/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
182	Hernandez, Erendira	ModivCare Inc.	2292	1/22/2026	General Unsecured Priority Secured Admin Priority Total	- 3,000 - 3,000 \$ 6,000
183	Herrera, Cathy	ModivCare Inc.	1929	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
184	Hexaware Technologies Limited	ModivCare Solutions, LLC	2409	2/4/2026	General Unsecured Priority Secured Admin Priority Total	- - - 150,639 \$ 150,639
185	Hickson, Betty	ModivCare Inc.	2435	2/8/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
186	Holliday, Kelly	ModivCare Inc.	1938	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
187	Holsapple, Ronnie L	ModivCare Inc.	2320	1/28/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
188	Hounshell, Billy	ModivCare Inc.	1736	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - 819 \$ 819
189	House, Betsy	ModivCare Inc.	2124	11/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
190	Howard, Kay	ModivCare Inc.	2018	10/28/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
191	Howard, Terry	ModivCare Inc.	1782	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
192	Howerton, Priscilla	ModivCare Inc.	1771	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
193	Howerton, Tina	ModivCare Inc.	1773	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
194	Hughes, Mahogany	ModivCare Solutions, LLC	2234	1/5/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
195	Hyppolite, Marie G	ModivCare Inc.	2083	11/12/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
196	International Life Support, Inc.	ModivCare Inc.	2388	2/4/2026	General Unsecured Priority Secured Admin Priority Total	44,559 - - - \$ 44,559
197	Isom, Freda	ModivCare Inc.	1978	10/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
198	Isom, Harold L	ModivCare Inc.	1980	10/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
199	J. L HARRIS TRANSPORTATION	ModivCare Solutions, LLC	1959	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- 2,950 - - \$ 2,950
200	Jackson, Katrina	ModivCare Inc.	2300	1/26/2026	General Unsecured Priority Secured Admin Priority Total	80 - - - \$ 80

Appendix 2

Objection Procedures

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	x	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	x	

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors² may file omnibus objections (each, an “*Omnibus Objection*”) to Claims on the grounds that such Claims, in part or in whole:

- (a) are inconsistent with the Reorganized Debtors’ books and records;
- (b) fail to specify the asserted Claim amount (or only list the Claim amount as “unliquidated”);
- (c) seek recovery of amounts for which the Reorganized Debtors are not liable;
- (d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors’ Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;
- (e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;
- (f) fail to specify a Reorganized Debtor against which the Claim is asserted;

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the “*Motion*”).

- (g) are disallowed pursuant to section 502 of the Bankruptcy Code;
- (h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;
- (i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;
- (j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the “*Withdrawal Form*”) available on the Claims and Noticing Agent’s website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);
- (k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;
- (l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors’ insurers (in which case the details of payments must be included with the Omnibus Objection); or
- (m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the rescission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors’ objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

- (a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;
- (b) the asserted amount of the Claim;
- (c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;
- (d) a summary of the grounds for the objection;
- (e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and
- (f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "**Order**") as Exhibit 2 (the "**Objection Notice**"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

- (a) adequately describe the nature of the objection;
- (b) inform Holders that their rights may be affected by the objection;
- (c) describe the procedures for filing a written response (each, a "**Response**") to the objection, including all relevant dates and deadlines related thereto;
- (d) identify the hearing date, if applicable, and related information; and
- (e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "**Response Procedures**") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and
- (c) the following contact information for the responding party:
 - (i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov/>.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit R

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

----- X
 :
 In re: : Chapter 11
 :
 MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

NOTICE OF REORGANIZED DEBTORS’ FIFTH OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Claimants receiving this notice (this “Notice”) should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by April 25, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the “*Reorganized Debtors*”) have filed the Objection attached hereto as **Appendix 1** (the “*Omnibus Objection*”) to your claim(s).²

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf is deficient because: the Proof of Claim was not timely filed by the deadline set by the Court.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Omnibus Objection.

disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "**Response**") with the United States Bankruptcy Court for the Southern District of Texas (the "**Court**") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **April 25, 2026, at 4:00 p.m. (prevailing Central Time)**.

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at <https://www.txs.uscourts.gov> or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **April 25, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to **disallow and expunge** your Claim(s) based on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in the Chapter 11 Cases (the "**Objection Procedures**").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures requires that each Response must contain the following information (at a minimum):

a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

the following contact information for the responding party:

the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **April 25, 2026**, at 4:00 p.m. (prevailing Central Time) unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov>. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	x	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	x	

**REORGANIZED DEBTORS' FIFTH
OMNIBUS OBJECTION TO CERTAIN CLAIMS (LATE-FILED CLAIMS)**

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THE BANKRUPTCY CASE. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED WITHOUT A HEARING.

TO THE CLAIMANTS WHOSE CLAIMS ARE SUBJECT TO THIS OBJECTION:

YOUR SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND ANY FURTHER OBJECTIONS THAT MAY BE FILED IN THE CHAPTER 11 CASES.

THE RELIEF SOUGHT IN THIS OBJECTION IS WITHOUT PREJUDICE TO THE RIGHTS OF THE REORGANIZED DEBTORS AND THEIR ESTATES OR OTHER PARTIES IN INTEREST TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED HEREIN AND OTHER CLAIMS FILED IN THE CHAPTER 11 CASES.

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

The above-captioned reorganized debtors (prior to the Effective Date,² collectively, the “*Debtors*” and after the Effective Date, collectively, the “*Reorganized Debtors*”) respectfully state the following in support of this omnibus claims objection (this “*Objection*”).

RELIEF REQUESTED

1. By this Objection, the Reorganized Debtors seek entry of an order substantially in the form attached hereto (the “*Proposed Order*”) disallowing the claims listed on **Schedule 1** (the “*Late-Filed Claims*”) to the Proposed Order in their entirety because each of the Late-Filed Claims was filed after the applicable Claims Bar Date.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the “*Court*”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution.

3. Each of the Late-Filed Claims that are the subject of this Objection were asserted on proof of claim forms (each a “*Proof of Claim*” and collectively the “*Claim Forms*”) filed with the Claims and Noticing Agent (as defined below). By seeking recovery from the Reorganized Debtors’ estates based on the filing of a Proof of Claim, the holders of the Late-Filed Claims (each a “*Claimant*” and collectively the “*Claimants*”) have submitted to the Court’s jurisdiction over this matter.

4. Venue of the Chapter 11 Cases and this Objection in this district is proper under 28 U.S.C. §§ 1408 and 1409.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1055, Ex. A] (together with all supplemental or supporting documentation related thereto, the “*Plan*”), as applicable.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “**Bankruptcy Local Rules**”), and the Procedures for Complex Cases in the Southern District of Texas.

BACKGROUND

6. On August 20, 2025, the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered, for procedural purposes only, pursuant to Rule 1015(b) of the Bankruptcy Rules and Rule 1015-1 of the Bankruptcy Local Rules. The factual background regarding the Debtors, including their business, their capital structure, and the events leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First-Day Relief* [Docket No. 14].

7. On December 15, 2025, the Court entered the Confirmation Order³ which, among other things, confirmed the Plan. The Effective Date occurred on December 29, 2025.

CLAIMS RECONCILIATION PROCESS

8. On August 21, 2025, the Court entered the *Order Establishing (A) Bar Dates and Related Procedures for Filing Proofs of Claim; (B) Approving the Form and Manner of Notice Thereof; and (C) Granting Related Relief* [Docket No. 66] (the “**Claims Bar Date Order**”) setting, *inter alia*, October 1, 2025, as the deadline for non-governmental creditors and interest holders to file claims in the Chapter 11 Cases (the “**General Bar Date**”).

³ Docket No. 1055.

9. The deadline for all governmental units asserting a “claim” (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose on or prior to the Petition Date to file a Proof of Claim on account of such claim was February 16, 2026, at 5:00 p.m. (prevailing Central Time) (the “**Governmental Bar Date**” and together with the General Bar Date, as applicable depending on whether the claimant is a governmental unit or non-governmental unit, the “**Claims Bar Date**”).

10. The Claims Bar Date Order establishes certain requirements that a filed claim must satisfy to be considered valid. A filed claim must, among other things, “set forth with specificity the legal and factual basis for the alleged claim,” and “include supporting documentation or an explanation as to why such documentation is not available.” Claims Bar Date Order, ¶ 7. If such filed claims are not properly submitted prior to the Claims Bar Date, the Claims Bar Date Order provides that the relevant claimant “shall not be treated as a creditor with respect to such claim for purposes of voting and **distribution**.” *Id.* at ¶ 20 (emphasis added).

11. On August 23, 2025, the Reorganized Debtors’ claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global (the “**Claims and Noticing Agent**”), mailed notice of the Claims Bar Date (the “**Bar Date Notice**”) to potential claimants in accordance with the procedures set forth in the Claims Bar Date Order. *See Affidavit of Service* [Docket No. 98]. Also, as certified at Docket No. 142, in accordance with the Claims Bar Date Order, the Reorganized Debtors published the Bar Date Notice in *The New York Times* on August 26, 2025. *See Affidavit of Publication of the Notice of Deadline for the Filing of Proofs of Claim, Including for Claims Asserted Under Section 503(b)(9) of the Bankruptcy Code in the New York Times* [Docket No. 142].

12. The Reorganized Debtors also listed numerous claims in their Schedules⁴ (such claims, along with the claims asserted in each proof of claim filed in the Chapter 11 Cases, collectively, the “*Claims*”), some of which have been satisfied under the authority granted to the Reorganized Debtors pursuant to certain “first day” orders and other orders entered in these Chapter 11 Cases. A database of all Claims is being maintained by the Reorganized Debtors’ Claims and Noticing Agent (the “*Claims Register*”).⁵ Pursuant to the Plan, the Claims Objection Deadline is currently, subject to the Reorganized Debtors’ right to seek a further extension of such deadline in accordance with the Plan,⁶ March 29, 2026 (*i.e.*, the date that is ninety (90) days after the occurrence of the Effective Date).⁷

13. On February 19, 2026, the Court entered the *Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1313] (the “*Omnibus Objection Procedures Order*”) approving the procedures for filing and resolving omnibus objections to Claims asserted against the Reorganized Debtors in the Chapter 11 Cases appended to the Omnibus Objection Procedures Order as Exhibit 1 (the “*Objection Procedures*”). The Objection Notice (as defined in the Objection Procedures) and the Objection Procedures will be served on the holders of the Late-Filed Claims along with this Objection.

⁴ On September 7, 2025, the Reorganized Debtors filed their respective schedules of assets and liabilities (the “*Schedules*”) and statements of financial affairs [Docket Nos. 177–322], pursuant to Bankruptcy Rule 1007.

⁵ Under section 1111(a) of the Bankruptcy Code, scheduled claims are treated as proofs of claim. *See* 11 U.S.C. § 1111(a) (“A proof of claim . . . is deemed filed under section 501 of this title for any claim . . . that appears in the schedules . . . except a claim . . . that is scheduled as disputed, contingent, or unliquidated.”).

⁶ *See* Plan, p. 3 (defining “Claims Objection Deadline” as “ninety (90) days after the Effective Date . . . which dates may be extended pursuant to an order of the Bankruptcy Court upon a motion Filed by the Reorganized Debtors.”).

⁷ The Claims Objection Deadline with respect to claims filed by governmental units is ninety (90) days after the Governmental Bar Date, whereas for claims filed by non-governmental units it is ninety (90) days after the occurrence of the Effective Date.

THE LATE-FILED CLAIMS

14. The Reorganized Debtors' review of the Claims Register allowed them to identify the Late-Filed Claims. This Objection seeks to disallow the Late-Filed Claims in their entirety because each Late-Filed Claim was filed after the applicable Bar Date.

15. As attested to in the *Affidavit of Kenneth Shepard in Support of Debtors' Fifth Omnibus Objection to Certain Claims* attached hereto as **Exhibit A**, based on their review of the Claims Register, the Reorganized Debtors and their advisors identified each Late-Filed Claim on **Schedule 1** to the Proposed Order as being filed after the occurrence of the applicable Claims Bar Date. To identify the Late-Filed Claims, the Reorganized Debtors:

- (a) reviewed the Claims Register to identify instances in which a Claim was submitted after the applicable Claims Bar Date; and
- (b) determined that there were no agreements or other arrangements between the holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the relevant Claims Bar Date.

16. The Reorganized Debtors hereby request that the Late-Filed Claims be disallowed in their entirety and expunged.

BASIS FOR RELIEF

17. Section 502 of the Bankruptcy Code provides, in pertinent part, that: “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest ... objects.” 11 U.S.C. § 502. Moreover, section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed if “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law” 11 U.S.C. § 502(b)(1). Bankruptcy Rule 3007 provides certain grounds upon which “objections to more than one claim may be joined in a single objection.” FED. R. BANKR. P.

3007(d). This includes objections on the grounds that claims should be disallowed because they “were not timely filed.” FED. R. BANKR. P. 3007(d)(2)(D).

18. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g., In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). A proof of claim loses the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim’s legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id.* Despite this shifting burden during the claim objection process, “the ultimate burden of proof always lies with the claimant.” *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Rev.*, 530 U.S. 15 (2000)).

19. Here, the Court established, pursuant to the Claims Bar Date Order, the Claims Bar Date as the deadline by which creditors were required to file a Proof of Claim conforming to the requirements set forth in the Claims Bar Date Order. The Claims Bar Date Order, in turn, expressly provides that the timely filing of a Proof of Claim was a prerequisite “in order to share in the Debtors’ estates,” Claims Bar Date Order, ¶ 5, and expressly provides that a creditor who failed to timely file a Proof of Claim “shall not be treated as a creditor with respect to such claim for purposes of voting and distribution.” *Id.* at ¶ 20. As set forth above, the Late-Filed Claims were not filed by the applicable Claims Bar Date, and, thus, are subject to disallowance under the express terms of the Claims Bar Date Order.

20. Therefore, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Plan, the Reorganized Debtors respectfully request that the Court enter the Proposed Order granting the relief requested herein.

RESERVATION OF RIGHTS

21. The Reorganized Debtors reserve the right to amend, modify, or supplement this Objection, and to file additional objections to any other Claims (filed or not) that may be asserted against the Reorganized Debtors and their estates. Should one or more of the grounds of objection stated in the Objection be dismissed or overruled, the Reorganized Debtors reserve the right to object to each of the Late-Filed Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

22. Nothing contained herein shall be deemed: (a) an admission as to the amount of, basis for, or validity of any Claim against the Reorganized Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any Claim against, or interest in, the Reorganized Debtors, or their property or estates; (c) a promise or requirement to pay any prepetition Claim; (d) an implication or admission that any particular Claim is of a type specified or defined in this Objection, or any order granting the relief requested by this Objection; (e) an implication, admission, or finding as to (i) the validity, enforceability, or perfection of any interest or encumbrance on the property of the Reorganized Debtors or their estates or (ii) the applicability of any exception or exclusion from property of the estate under section 541 of the Bankruptcy Code or other applicable law; (f) an impairment or waiver of any claims or causes of action which may exist against any entity; or (g) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law.

NOTICE

23. Notice of this Objection will be given to the Claimants, the parties on the Reorganized Debtors' Master Service List, and all parties that have requested or that are required to receive notice pursuant to Bankruptcy Rule 2002. The Reorganized Debtors submit that, under the circumstances, no other or further notice is required.

24. A copy of this Objection is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Claims and Noticing Agent at <https://www.veritaglobal.net/ModivCare>.

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter the Proposed Order sustaining the Objection and granting such other and further relief as may be just and proper.

Dated: March 26, 2026

Respectfully submitted,

/s/ Timothy A. ("Tad") Davidson II

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Co-Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on March 26, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II
Timothy A. ("Tad") Davidson II

Exhibit A
Shepard Declaration

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

-----	x
	:
In re:	: Chapter 11
	:
MODIVCARE INC., <i>et al.</i> ,	: Case No. 25-90309 (ARP)
	:
Reorganized Debtors. ¹	: (Jointly Administered)
	:
-----	x

**AFFIDAVIT OF KENNETH SHEPARD
IN SUPPORT OF REORGANIZED DEBTORS’
FIFTH OMNIBUS OBJECTION TO CERTAIN CLAIMS**

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this “*Affidavit*”) in support of the *Reorganized Debtors’ Fifth Omnibus Objection to Certain Claims* (the “*Objection*”)² pursuant to Rule 3007-1 of the Local Bankruptcy Rules for the Southern District of Texas.

2. I am a senior vice president of finance for the Reorganized Debtors a role that I have served in for approximately two years. I have worked for the Reorganized Debtors for over ten years and in finance for approximately 20 years.

3. I am knowledgeable about, and familiar with, the Reorganized Debtors’ day-to-day operations, business and financial affairs, books and records, and the circumstances that led to the commencement of the Chapter 11 Cases. The facts set forth in this Declaration are based upon

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Objection.

my personal knowledge, my review of relevant documents, information provided to me by employees working under my supervision, my own reasonable inquiry, and/or my discussions with the Reorganized Debtors' other officers, directors, and restructuring advisors, including professionals at Latham & Watkins LLP, Hunton Andrews Kurth LLP, Moelis & Company, FTI Consulting, Inc., and Kurtzman Carson Consultants, LLC d/b/a Verita Global. If called upon to testify, I would testify to the facts set forth in this Affidavit. I am authorized to submit this Affidavit.

OBJECTION TO LATE-FILED CLAIMS

4. Article VII of the Plan empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified certain Late-Filed Claims which they seek the disallowance of in their entirety.

5. The Late-Filed Claims were identified after the Reorganized Debtors:
- (a) reviewed the Claims Register to identify instances in which more a Claim was submitted after the applicable Bar Date; and
 - (b) determined that there were no agreements or other arrangements between the Holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the Claims Bar Date.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 26, 2026

/s/ Kenneth Shepard

Name: Kenneth Shepard

Title: Senior Vice President – Finance
ModivCare Solutions, LLC and its
Reorganized Debtor Affiliates

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	x	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	x	

**ORDER GRANTING REORGANIZED DEBTORS’
FIFTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**
[Relates to Docket No.]

Upon the objection (the “*Objection*”)² of the Reorganized Debtors seeking entry of an order (this “*Order*”) disallowing the Late-Filed Claims in their entirety as set forth in **Schedule 1** hereto, all as more fully set forth in the Objection; and the Court having reviewed the Objection; and the Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and that no other or further notice is necessary, except as set forth in this Order; and all responses, if any, to the Objection having been withdrawn, resolved, or overruled; and upon the record herein; and upon the record herein; and after due deliberation

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Objection.

thereon; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Objection is in the best interests of the Reorganized Debtors, their estates, their creditors, and other parties in interest, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is GRANTED, as set forth herein.
2. Each Late-Filed Claim listed on Schedule 1 is disallowed and expunged in its entirety.
3. The Claims and Noticing Agent is authorized to update the claims register maintained in the Chapter 11 Cases to reflect the relief granted in this Order.
4. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in the Objection or this Order shall be deemed a waiver of the rights of the Reorganized Debtors to object to any Claim, and shall not constitute an admission of liability by the Reorganized Debtors with respect to any Proof of Claim or application for administrative expenses.
5. Each Late-Filed Claim and the Reorganized Debtors' objections to each Late-Filed Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Late-Filed Claim.
6. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any Claim against the Reorganized Debtors; (b) as a waiver of the Reorganized Debtors' rights to dispute or otherwise object to any Claim on any grounds or basis; or (c) to waive or release any right, claim, defense, or counterclaim of the Reorganized Debtors,

or to estop the Reorganized Debtors from asserting any right, claim, defense, or counterclaim (including setoff).

7. Notice of the Objection as provided therein shall be deemed good and sufficient and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

8. Notwithstanding any applicable Bankruptcy Rules to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon its entry.

9. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Objection.

10. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____, 2026

UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

Late Filed Claims 201 - 300						Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Claim Nature	Claim Amount	
201	Jackson, Patrick	ModivCare Inc.	2432	2/5/2026	General Unsecured Priority Secured Admin Priority Total	- - 3,988 \$ 3,988	
202	Jacobs, Laquanda	ModivCare Inc.	2101	11/14/2025	General Unsecured Priority Secured Admin Priority Total	- 17,150 - \$ 17,150	
203	James, Brandy	ModivCare Inc.	1781	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- 700 - \$ 700	
204	James, Evangelina	ModivCare Inc.	1934	10/16/2025	General Unsecured Priority Secured Admin Priority Total	- - - 2,500	
205	Jarrell, Brenda	ModivCare Inc.	1734	10/3/2025	General Unsecured Priority Secured Admin Priority Total	259 - - \$ 2,500	
206	Jean Louis, Widelene	ModivCare Inc.	1937	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ 259	
207	Jenkins, Lisa	ModivCare Inc.	2122	11/22/2025	General Unsecured Priority Secured Admin Priority Total	5,000 - - \$ -	
208	Jensen, Tiffany	ModivCare Inc.	1763	10/5/2025	General Unsecured Priority Secured Admin Priority Total	1,268 - - \$ 1,268	
209	Jensen, Tiffany N	ModivCare Inc.	2326	1/29/2026	General Unsecured Priority Secured Admin Priority Total	1,268 - - \$ 1,268	
210	Jersey Central Power & Light	Care Finders Total Care LLC	1788	10/6/2025	General Unsecured Priority Secured Admin Priority Total	1,459 - - \$ 1,459	

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
211	Jewell, Charles	ModivCare Inc.	1968	10/18/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
212	Johnson, Abra	ModivCare Inc.	2263	1/14/2026	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
213	Johnson, Arthur	ModivCare Inc.	2346	2/2/2026	General Unsecured Priority Secured Admin Priority Total	250 - - \$ 250
214	Johnson, Flora	ModivCare Inc.	1947	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
215	Johnson, Leranda	ModivCare Inc.	1834	10/8/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
216	Jones, Arntee	ModivCare Inc.	1918	10/14/2025	General Unsecured Priority Secured Admin Priority Total	- 1,500 - \$ 1,500
217	Jones, David	ModivCare Inc.	2160	12/5/2025	General Unsecured Priority Secured Admin Priority Total	859 - - \$ 859
218	Jones, Debra	ModivCare Inc.	1926	10/15/2025	General Unsecured Priority Secured Admin Priority Total	2,000,000 - - \$ 2,000,000
219	Jones, LaTerra	ModivCare Inc.	2269	1/16/2026	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
220	Karabin, Jennifer	ModivCare Inc.	2237	1/6/2026	General Unsecured Priority Secured Admin Priority Total	5,280 - - \$ 5,280

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
231	Knotts, Brittany	ModivCare Inc.	2348	2/2/2026	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
232	Kyle, Scholeigh	ModivCare Inc.	1790	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
233	Kyle, Scholeigh	ModivCare Inc.	2215	12/23/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
234	Lagasse, Deborah	ModivCare Inc.	1827	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
235	Lake Country Area Agency on Aging	ModivCare Inc.	1703	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- 968 - \$ 968
236	Lake Country Area Agency on Aging	ModivCare Inc.	1698	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- 284 - \$ 284
237	Lakhiaminh, Brady	ModivCare Inc.	2325	1/30/2026	General Unsecured Priority Secured Admin Priority Total	- - - 10,000
238	Law Office of Marc L. Shapiro, P.A.	ModivCare Inc.	2115	11/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ 10,000 300,000
239	Lawrence, Misty	ModivCare Inc.	1923	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
240	Lee Paige dba Meduport	ModivCare Inc.	2359	2/3/2026	General Unsecured Priority Secured Admin Priority Total	- - - 68,402 - - \$ 68,402

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
241	Lee, Thandi	ModivCare Inc.	2261	1/13/2026	General Unsecured Priority Secured Admin Priority Total	100 - - - \$ 100
242	Leverette, Thomas	ModivCare Solutions, LLC	2061	11/5/2025	General Unsecured Priority Secured Admin Priority Total	- - - 808 \$ 808
243	Leverette, Thomas	ModivCare Inc.	2268	1/15/2026	General Unsecured Priority Secured Admin Priority Total	- - - 807 \$ 807
244	Lewis Hagar, Estate of Johnnie Hagar	ModivCare Solutions, LLC	2027	10/30/2025	General Unsecured Priority Secured Admin Priority Total	1,000,000 - - - \$ 1,000,000
245	Lewis, Diamon	ModivCare Inc.	2172	12/9/2025	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
246	Leyba, Maria	All Metro Field Service Workers Payroll Services Corporation	1880	10/10/2025	General Unsecured Priority Secured Admin Priority Total	- 1,738 - - \$ 1,738
247	LifeFleet Southeast, Inc.	ModivCare Inc.	2384	2/4/2026	General Unsecured Priority Secured Admin Priority Total	11,671 - - - \$ 11,671
248	Lingo, Jennifer	ModivCare Inc.	1730	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
249	LinkedIn Corporation	ModivCare Solutions, LLC	2426	2/5/2026	General Unsecured Priority Secured Admin Priority Total	- - - 115,804 \$ 115,804
250	Linwood, Chadwyck	ModivCare Inc.	2254	1/13/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
251	Liu, Qian	ModivCare Inc.	1946	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- - 93 -
252	Llorens, Leticia	Provado Technologies, LLC	2029	10/31/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
253	Lopez, Alvaro	ModivCare Inc.	1971	10/20/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
254	Lopez, Troy	ModivCare Inc.	1766	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
255	Lu, David	ModivCare Inc.	1991	10/24/2025	General Unsecured Priority Secured Admin Priority Total	- 5,700 - 12,300 \$18,000
256	Lui, Chi-wai	ModivCare Inc.	2009	10/22/2025	General Unsecured Priority Secured Admin Priority Total	- - 18,000 \$18,000
257	Macias, Miguel A	ModivCare Inc.	1948	10/16/2025	General Unsecured Priority Secured Admin Priority Total	3,000 - - \$3,000
258	Mack, Tenisha	ModivCare Solutions, LLC	2162	12/4/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
259	Marcelin, Nadege	ModivCare Inc.	1990	10/24/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
260	MARHABA TRANSPORT SERVICES LLC	ModivCare Inc.	1720	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - 21,350 \$21,350

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
261	Marriona, Gloria	ModivCare Inc.	1986	10/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ -
262	Martin, Tina	ModivCare Inc.	2031	10/31/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ -
263	Martinez, Debra (Administrator of the Estate of June Riglietti, Deceased)	ModivCare Inc.	2232	12/23/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ -
264	Martinez, Debra (Administrator of the Estate of June Riglietti, Deceased)	ModivCare Inc.	2233	12/23/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ -
265	Martinez, Heather	ModivCare Solutions, LLC	2291	1/22/2026	General Unsecured Priority Secured Admin Priority Total	150 - - -	\$ 150
266	Martinez, Heather N	ModivCare Solutions, LLC	1858	10/9/2025	General Unsecured Priority Secured Admin Priority Total	1,956 - - -	\$ 1,956
267	Martinez, Heather N	ModivCare Inc.	1979	10/21/2025	General Unsecured Priority Secured Admin Priority Total	2,490 - - -	\$ 2,490
268	Martinez, Mike	ModivCare Inc.	1696	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ -
269	Masneri, Sebastian	ModivCare Inc.	2273	1/18/2026	General Unsecured Priority Secured Admin Priority Total	- - - 417	\$ 417
270	Massey, Gina	ModivCare Solutions, LLC	2032	11/1/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ -

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
271	Massimi, Laura	ModivCare Inc.	1850	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
272	Massimi, Laura	ModivCare Inc.	2327	1/30/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
273	Matthews, Maxine Cola	ModivCare Inc.	1741	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
274	McClain, Lisa	ModivCare Solutions, LLC	2078	11/12/2025	General Unsecured Priority Secured Admin Priority Total	- - - - 223 \$ 223
275	McGee, Yvonne	ModivCare Inc.	1794	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
276	McKenzie, Priscilla	ModivCare Inc.	1823	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
277	McKinney, Willie	ModivCare Inc.	1746	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
278	McMillan, Yucef	ModivCare Inc.	2228	12/29/2025	General Unsecured Priority Secured Admin Priority Total	- 6,600 - 6,600 \$ 13,200
279	McNeal, Yolanda	ModivCare Inc.	2062	11/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
280	McNeil, Yolanda	ModivCare Inc.	2063	11/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
281	Medevac MidAmerica, Inc.	ModivCare Inc.	2395	2/4/2026	General Unsecured Priority Secured Admin Priority Total	11,953 - - - \$ 11,953
282	Medi-Car Ambulance Service, Inc.	ModivCare Inc.	2397	2/4/2026	General Unsecured Priority Secured Admin Priority Total	837 - - - \$ 837
283	Medics Ambulance Service, Inc.	ModivCare Inc.	2403	2/4/2026	General Unsecured Priority Secured Admin Priority Total	2,382 - - - \$ 2,382
284	Melendez, Gilma	ModivCare Inc.	2272	1/18/2026	General Unsecured Priority Secured Admin Priority Total	190 - - - \$ 190
285	MERCER US LLC	ModivCare Inc.	1863	10/9/2025	General Unsecured Priority Secured Admin Priority Total	13,365 - - - \$ 13,365
286	Miami Lakes Center LLC	ModivCare Solutions, LLC	2036	11/3/2025	General Unsecured Priority Secured Admin Priority Total	461,467 - 42,416 - \$ 503,883
287	MIDDLETONS TRANSPORT LLC	ModivCare Solutions, LLC	1999	10/26/2025	General Unsecured Priority Secured Admin Priority Total	4,050 20,950 - - \$ 25,000
288	Miles, Carl	ModivCare Inc.	2155	12/1/2025	General Unsecured Priority Secured Admin Priority Total	99,000,000 - - - \$ 99,000,000
289	Miller, Debra	ModivCare Inc.	2224	12/28/2025	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
290	Miller, Joseph	ModivCare Inc.	2226	12/28/2025	General Unsecured Priority Secured Admin Priority Total	300 - - - \$ 300

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
291	Mitchell, Carah	ModivCare Inc.	2245	1/12/2026	General Unsecured	416
					Priority Secured	-
					Admin Priority	-
					Total	\$ 416
292	MJ Simon and Company	ModivCare Solutions, LLC	2258	1/13/2026	General Unsecured	12,993
					Priority Secured	-
					Admin Priority	-
					Total	\$12,993
293	Montano, Larry	ModivCare Inc.	1750	10/3/2025	General Unsecured	1,333
					Priority Secured	-
					Admin Priority	-
					Total	\$ 1,333
294	Moon, Mary	ModivCare Solutions, LLC	1969	10/20/2025	General Unsecured	-
					Priority Secured	-
					Admin Priority	-
					Total	\$ -
295	Moore, Salinda	ModivCare Inc.	2073	11/10/2025	General Unsecured	-
					Priority Secured	-
					Admin Priority	-
					Total	\$ -
296	Morrell, Kaylee	ModivCare Inc.	1816	10/7/2025	General Unsecured	32
					Priority Secured	-
					Admin Priority	-
					Total	\$ 32
297	Morris, Stephen	ModivCare Inc.	1958	10/17/2025	General Unsecured	-
					Priority Secured	650
					Admin Priority	-
					Total	\$ 650
298	Morris, William	ModivCare Inc.	1752	10/3/2025	General Unsecured	-
					Priority Secured	-
					Admin Priority	-
					Total	\$ -
299	Morrison, Sherry	ModivCare Inc.	1853	10/8/2025	General Unsecured	-
					Priority Secured	-
					Admin Priority	-
					Total	\$ -
300	Muralli, William	ModivCare Inc.	1989	10/24/2025	General Unsecured	-
					Priority Secured	1,067
					Admin Priority	-
					Total	\$ 1,067

Appendix 2

Objection Procedures

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	x	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	x	

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors² may file omnibus objections (each, an “*Omnibus Objection*”) to Claims on the grounds that such Claims, in part or in whole:

- (a) are inconsistent with the Reorganized Debtors’ books and records;
- (b) fail to specify the asserted Claim amount (or only list the Claim amount as “unliquidated”);
- (c) seek recovery of amounts for which the Reorganized Debtors are not liable;
- (d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors’ Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;
- (e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;
- (f) fail to specify a Reorganized Debtor against which the Claim is asserted;

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the “*Motion*”).

- (g) are disallowed pursuant to section 502 of the Bankruptcy Code;
- (h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;
- (i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;
- (j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the “*Withdrawal Form*”) available on the Claims and Noticing Agent’s website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);
- (k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;
- (l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors’ insurers (in which case the details of payments must be included with the Omnibus Objection); or
- (m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the rescission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors’ objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

- (a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;
- (b) the asserted amount of the Claim;
- (c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;
- (d) a summary of the grounds for the objection;
- (e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and
- (f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "**Order**") as Exhibit 2 (the "**Objection Notice**"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

- (a) adequately describe the nature of the objection;
- (b) inform Holders that their rights may be affected by the objection;
- (c) describe the procedures for filing a written response (each, a "**Response**") to the objection, including all relevant dates and deadlines related thereto;
- (d) identify the hearing date, if applicable, and related information; and
- (e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "**Response Procedures**") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and
- (c) the following contact information for the responding party:
 - (i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov/>.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit S

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

-----	X
	:
In re:	: Chapter 11
	:
MODIVCARE INC., <i>et al.</i> ,	: Case No. 25-90309 (ARP)
	:
Reorganized Debtors. ¹	: (Jointly Administered)
	:
-----	X

NOTICE OF REORGANIZED DEBTORS’ SIXTH OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Claimants receiving this notice (this “Notice”) should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by April 25, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the “*Reorganized Debtors*”) have filed the Objection attached hereto as **Appendix 1** (the “*Omnibus Objection*”) to your claim(s).²

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf is deficient because: the Proof of Claim was not timely filed by the deadline set by the Court.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Omnibus Objection.

disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "**Response**") with the United States Bankruptcy Court for the Southern District of Texas (the "**Court**") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **April 25, 2026, at 4:00 p.m. (prevailing Central Time)**.

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at <https://www.txs.uscourts.gov> or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **April 25, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to **disallow and expunge** your Claim(s) based on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in the Chapter 11 Cases (the "**Objection Procedures**").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures requires that each Response must contain the following information (at a minimum):

a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

the following contact information for the responding party:

the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **April 25, 2026**, at 4:00 p.m. (prevailing Central Time) unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov>. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

----- X
 :
 In re: : Chapter 11
 :
 MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

**REORGANIZED DEBTORS' SIXTH
OMNIBUS OBJECTION TO CERTAIN CLAIMS (LATE-FILED CLAIMS)**

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THE BANKRUPTCY CASE. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED WITHOUT A HEARING.

TO THE CLAIMANTS WHOSE CLAIMS ARE SUBJECT TO THIS OBJECTION:

YOUR SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND ANY FURTHER OBJECTIONS THAT MAY BE FILED IN THE CHAPTER 11 CASES.

THE RELIEF SOUGHT IN THIS OBJECTION IS WITHOUT PREJUDICE TO THE RIGHTS OF THE REORGANIZED DEBTORS AND THEIR ESTATES OR OTHER PARTIES IN INTEREST TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED HEREIN AND OTHER CLAIMS FILED IN THE CHAPTER 11 CASES.

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

The above-captioned reorganized debtors (prior to the Effective Date,² collectively, the “*Debtors*” and after the Effective Date, collectively, the “*Reorganized Debtors*”) respectfully state the following in support of this omnibus claims objection (this “*Objection*”).

RELIEF REQUESTED

1. By this Objection, the Reorganized Debtors seek entry of an order substantially in the form attached hereto (the “*Proposed Order*”) disallowing the claims listed on **Schedule 1** (the “*Late-Filed Claims*”) to the Proposed Order in their entirety because each of the Late-Filed Claims was filed after the applicable Claims Bar Date.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the “*Court*”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution.

3. Each of the Late-Filed Claims that are the subject of this Objection were asserted on proof of claim forms (each a “*Proof of Claim*” and collectively the “*Claim Forms*”) filed with the Claims and Noticing Agent (as defined below). By seeking recovery from the Reorganized Debtors’ estates based on the filing of a Proof of Claim, the holders of the Late-Filed Claims (each a “*Claimant*” and collectively the “*Claimants*”) have submitted to the Court’s jurisdiction over this matter.

4. Venue of the Chapter 11 Cases and this Objection in this district is proper under 28 U.S.C. §§ 1408 and 1409.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1055, Ex. A] (together with all supplemental or supporting documentation related thereto, the “*Plan*”), as applicable.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “**Bankruptcy Local Rules**”), and the Procedures for Complex Cases in the Southern District of Texas.

BACKGROUND

6. On August 20, 2025, the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered, for procedural purposes only, pursuant to Rule 1015(b) of the Bankruptcy Rules and Rule 1015-1 of the Bankruptcy Local Rules. The factual background regarding the Debtors, including their business, their capital structure, and the events leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First-Day Relief* [Docket No. 14].

7. On December 15, 2025, the Court entered the Confirmation Order³ which, among other things, confirmed the Plan. The Effective Date occurred on December 29, 2025.

CLAIMS RECONCILIATION PROCESS

8. On August 21, 2025, the Court entered the *Order Establishing (A) Bar Dates and Related Procedures for Filing Proofs of Claim; (B) Approving the Form and Manner of Notice Thereof; and (C) Granting Related Relief* [Docket No. 66] (the “**Claims Bar Date Order**”) setting, *inter alia*, October 1, 2025, as the deadline for non-governmental creditors and interest holders to file claims in the Chapter 11 Cases (the “**General Bar Date**”).

³ Docket No. 1055.

9. The deadline for all governmental units asserting a “claim” (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose on or prior to the Petition Date to file a Proof of Claim on account of such claim was February 16, 2026, at 5:00 p.m. (prevailing Central Time) (the “**Governmental Bar Date**” and together with the General Bar Date, as applicable depending on whether the claimant is a governmental unit or non-governmental unit, the “**Claims Bar Date**”).

10. The Claims Bar Date Order establishes certain requirements that a filed claim must satisfy to be considered valid. A filed claim must, among other things, “set forth with specificity the legal and factual basis for the alleged claim,” and “include supporting documentation or an explanation as to why such documentation is not available.” Claims Bar Date Order, ¶ 7. If such filed claims are not properly submitted prior to the Claims Bar Date, the Claims Bar Date Order provides that the relevant claimant “shall not be treated as a creditor with respect to such claim for purposes of voting and **distribution**.” *Id.* at ¶ 20 (emphasis added).

11. On August 23, 2025, the Reorganized Debtors’ claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global (the “**Claims and Noticing Agent**”), mailed notice of the Claims Bar Date (the “**Bar Date Notice**”) to potential claimants in accordance with the procedures set forth in the Claims Bar Date Order. *See Affidavit of Service* [Docket No. 98]. Also, as certified at Docket No. 142, in accordance with the Claims Bar Date Order, the Reorganized Debtors published the Bar Date Notice in *The New York Times* on August 26, 2025. *See Affidavit of Publication of the Notice of Deadline for the Filing of Proofs of Claim, Including for Claims Asserted Under Section 503(b)(9) of the Bankruptcy Code in the New York Times* [Docket No. 142].

12. The Reorganized Debtors also listed numerous claims in their Schedules⁴ (such claims, along with the claims asserted in each proof of claim filed in the Chapter 11 Cases, collectively, the “**Claims**”), some of which have been satisfied under the authority granted to the Reorganized Debtors pursuant to certain “first day” orders and other orders entered in these Chapter 11 Cases. A database of all Claims is being maintained by the Reorganized Debtors’ Claims and Noticing Agent (the “**Claims Register**”).⁵ Pursuant to the Plan, the Claims Objection Deadline is currently, subject to the Reorganized Debtors’ right to seek a further extension of such deadline in accordance with the Plan,⁶ March 29, 2026 (*i.e.*, the date that is ninety (90) days after the occurrence of the Effective Date).⁷

13. On February 19, 2026, the Court entered the *Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1313] (the “**Omnibus Objection Procedures Order**”) approving the procedures for filing and resolving omnibus objections to Claims asserted against the Reorganized Debtors in the Chapter 11 Cases appended to the Omnibus Objection Procedures Order as Exhibit 1 (the “**Objection Procedures**”). The Objection Notice (as defined in the Objection Procedures) and the Objection Procedures will be served on the holders of the Late-Filed Claims along with this Objection.

⁴ On September 7, 2025, the Reorganized Debtors filed their respective schedules of assets and liabilities (the “**Schedules**”) and statements of financial affairs [Docket Nos. 177–322], pursuant to Bankruptcy Rule 1007.

⁵ Under section 1111(a) of the Bankruptcy Code, scheduled claims are treated as proofs of claim. *See* 11 U.S.C. § 1111(a) (“A proof of claim . . . is deemed filed under section 501 of this title for any claim . . . that appears in the schedules . . . except a claim . . . that is scheduled as disputed, contingent, or unliquidated.”).

⁶ *See* Plan, p. 3 (defining “Claims Objection Deadline” as “ninety (90) days after the Effective Date . . . which dates may be extended pursuant to an order of the Bankruptcy Court upon a motion Filed by the Reorganized Debtors.”).

⁷ The Claims Objection Deadline with respect to claims filed by governmental units is ninety (90) days after the Governmental Bar Date, whereas for claims filed by non-governmental units it is ninety (90) days after the occurrence of the Effective Date.

THE LATE-FILED CLAIMS

14. The Reorganized Debtors' review of the Claims Register allowed them to identify the Late-Filed Claims. This Objection seeks to disallow the Late-Filed Claims in their entirety because each Late-Filed Claim was filed after the applicable Bar Date.

15. As attested to in the *Affidavit of Kenneth Shepard in Support of Debtors' Sixth Omnibus Objection to Certain Claims* attached hereto as **Exhibit A**, based on their review of the Claims Register, the Reorganized Debtors and their advisors identified each Late-Filed Claim on **Schedule 1** to the Proposed Order as being filed after the occurrence of the applicable Claims Bar Date. To identify the Late-Filed Claims, the Reorganized Debtors:

- (a) reviewed the Claims Register to identify instances in which a Claim was submitted after the applicable Claims Bar Date; and
- (b) determined that there were no agreements or other arrangements between the holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the relevant Claims Bar Date.

16. The Reorganized Debtors hereby request that the Late-Filed Claims be disallowed in their entirety and expunged.

BASIS FOR RELIEF

17. Section 502 of the Bankruptcy Code provides, in pertinent part, that: “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest ... objects.” 11 U.S.C. § 502. Moreover, section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed if “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law” 11 U.S.C. § 502(b)(1). Bankruptcy Rule 3007 provides certain grounds upon which “objections to more than one claim may be joined in a single objection.” FED. R. BANKR. P.

3007(d). This includes objections on the grounds that claims should be disallowed because they “were not timely filed.” FED. R. BANKR. P. 3007(d)(2)(D).

18. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g., In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). A proof of claim loses the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim’s legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id.* Despite this shifting burden during the claim objection process, “the ultimate burden of proof always lies with the claimant.” *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Rev.*, 530 U.S. 15 (2000)).

19. Here, the Court established, pursuant to the Claims Bar Date Order, the Claims Bar Date as the deadline by which creditors were required to file a Proof of Claim conforming to the requirements set forth in the Claims Bar Date Order. The Claims Bar Date Order, in turn, expressly provides that the timely filing of a Proof of Claim was a prerequisite “in order to share in the Debtors’ estates,” Claims Bar Date Order, ¶ 5, and expressly provides that a creditor who failed to timely file a Proof of Claim “shall not be treated as a creditor with respect to such claim for purposes of voting and distribution.” *Id.* at ¶ 20. As set forth above, the Late-Filed Claims were not filed by the applicable Claims Bar Date, and, thus, are subject to disallowance under the express terms of the Claims Bar Date Order.

20. Therefore, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Plan, the Reorganized Debtors respectfully request that the Court enter the Proposed Order granting the relief requested herein.

RESERVATION OF RIGHTS

21. The Reorganized Debtors reserve the right to amend, modify, or supplement this Objection, and to file additional objections to any other Claims (filed or not) that may be asserted against the Reorganized Debtors and their estates. Should one or more of the grounds of objection stated in the Objection be dismissed or overruled, the Reorganized Debtors reserve the right to object to each of the Late-Filed Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

22. Nothing contained herein shall be deemed: (a) an admission as to the amount of, basis for, or validity of any Claim against the Reorganized Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any Claim against, or interest in, the Reorganized Debtors, or their property or estates; (c) a promise or requirement to pay any prepetition Claim; (d) an implication or admission that any particular Claim is of a type specified or defined in this Objection, or any order granting the relief requested by this Objection; (e) an implication, admission, or finding as to (i) the validity, enforceability, or perfection of any interest or encumbrance on the property of the Reorganized Debtors or their estates or (ii) the applicability of any exception or exclusion from property of the estate under section 541 of the Bankruptcy Code or other applicable law; (f) an impairment or waiver of any claims or causes of action which may exist against any entity; or (g) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law.

NOTICE

23. Notice of this Objection will be given to the Claimants, the parties on the Reorganized Debtors' Master Service List, and all parties that have requested or that are required to receive notice pursuant to Bankruptcy Rule 2002. The Reorganized Debtors submit that, under the circumstances, no other or further notice is required.

24. A copy of this Objection is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Claims and Noticing Agent at <https://www.veritaglobal.net/ModivCare>.

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter the Proposed Order sustaining the Objection and granting such other and further relief as may be just and proper.

Dated: March 26, 2026

Respectfully submitted,

/s/ Timothy A. ("Tad") Davidson II

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Co-Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on March 26, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II
Timothy A. ("Tad") Davidson II

Exhibit A
Shepard Declaration

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

-----	X
	:
In re:	: Chapter 11
	:
MODIVCARE INC., <i>et al.</i> ,	: Case No. 25-90309 (ARP)
	:
Reorganized Debtors. ¹	: (Jointly Administered)
	:
-----	X

**AFFIDAVIT OF KENNETH SHEPARD
IN SUPPORT OF REORGANIZED DEBTORS’
SIXTH OMNIBUS OBJECTION TO CERTAIN CLAIMS**

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this “*Affidavit*”) in support of the *Reorganized Debtors’ Sixth Omnibus Objection to Certain Claims* (the “*Objection*”)² pursuant to Rule 3007-1 of the Local Bankruptcy Rules for the Southern District of Texas.

2. I am a senior vice president of finance for the Reorganized Debtors a role that I have served in for approximately two years. I have worked for the Reorganized Debtors for over ten years and in finance for approximately 20 years.

3. I am knowledgeable about, and familiar with, the Reorganized Debtors’ day-to-day operations, business and financial affairs, books and records, and the circumstances that led to the commencement of the Chapter 11 Cases. The facts set forth in this Declaration are based upon

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Objection.

my personal knowledge, my review of relevant documents, information provided to me by employees working under my supervision, my own reasonable inquiry, and/or my discussions with the Reorganized Debtors' other officers, directors, and restructuring advisors, including professionals at Latham & Watkins LLP, Hunton Andrews Kurth LLP, Moelis & Company, FTI Consulting, Inc., and Kurtzman Carson Consultants, LLC d/b/a Verita Global. If called upon to testify, I would testify to the facts set forth in this Affidavit. I am authorized to submit this Affidavit.

OBJECTION TO LATE-FILED CLAIMS

4. Article VII of the Plan empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified certain Late-Filed Claims which they seek the disallowance of in their entirety.

5. The Late-Filed Claims were identified after the Reorganized Debtors:
- (a) reviewed the Claims Register to identify instances in which more a Claim was submitted after the applicable Bar Date; and
 - (b) determined that there were no agreements or other arrangements between the Holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the Claims Bar Date.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 26, 2026

/s/ Kenneth Shepard

Name: Kenneth Shepard

Title: Senior Vice President – Finance
ModivCare Solutions, LLC and its
Reorganized Debtor Affiliates

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	x	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	x	

**ORDER GRANTING REORGANIZED DEBTORS’
SIXTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**
[Relates to Docket No.]

Upon the objection (the “*Objection*”)² of the Reorganized Debtors seeking entry of an order (this “*Order*”) disallowing the Late-Filed Claims in their entirety as set forth in **Schedule 1** hereto, all as more fully set forth in the Objection; and the Court having reviewed the Objection; and the Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and that no other or further notice is necessary, except as set forth in this Order; and all responses, if any, to the Objection having been withdrawn, resolved, or overruled; and upon the record herein; and upon the record herein; and after due deliberation

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Objection.

thereon; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Objection is in the best interests of the Reorganized Debtors, their estates, their creditors, and other parties in interest, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is GRANTED, as set forth herein.
2. Each Late-Filed Claim listed on Schedule 1 is disallowed and expunged in its entirety.
3. The Claims and Noticing Agent is authorized to update the claims register maintained in the Chapter 11 Cases to reflect the relief granted in this Order.
4. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in the Objection or this Order shall be deemed a waiver of the rights of the Reorganized Debtors to object to any Claim, and shall not constitute an admission of liability by the Reorganized Debtors with respect to any Proof of Claim or application for administrative expenses.
5. Each Late-Filed Claim and the Reorganized Debtors' objections to each Late-Filed Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Late-Filed Claim.
6. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any Claim against the Reorganized Debtors; (b) as a waiver of the Reorganized Debtors' rights to dispute or otherwise object to any Claim on any grounds or basis; or (c) to waive or release any right, claim, defense, or counterclaim of the Reorganized Debtors,

or to estop the Reorganized Debtors from asserting any right, claim, defense, or counterclaim (including setoff).

7. Notice of the Objection as provided therein shall be deemed good and sufficient and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

8. Notwithstanding any applicable Bankruptcy Rules to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon its entry.

9. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Objection.

10. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____, 2026

UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

Late Filed Claims 301-400							Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Claim Nature	Claim Amount		
301	Mukai, Brenda A	ModivCare Inc.	2306	1/26/2026	General Unsecured Priority Secured Admin Priority Total	- 95 - - \$ 95		
302	Mundell, Dolly M	ModivCare Inc.	2143	11/26/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -		
303	Musseman, Jacquelyn	ModivCare Inc.	2024	10/30/2025	General Unsecured Priority Secured Admin Priority Total	- 1,395 - - \$ 1,395		
304	Naha Mendoza, Melody	ModivCare Solutions, LLC	1860	10/8/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ 1,200		
305	Naranjo, Angel	ModivCare Inc.	2229	12/30/2025	General Unsecured Priority Secured Admin Priority Total	50 - - - \$ 50		
306	Nealis, Dottie	ModivCare Inc.	1821	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -		
307	Nealis, William Edward	ModivCare Inc.	1780	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -		
308	Negron Laracuente, Carlos	Victory Health Holdings, LLC	1762	10/5/2025	General Unsecured Priority Secured Admin Priority Total	- - - 25,000 \$ 25,000		
309	Neiswender, Barbara E	ModivCare Inc.	2002	10/27/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -		
310	Nelson, Donnell	ModivCare Inc.	2179	12/12/2025	General Unsecured Priority Secured Admin Priority Total	6,000 10,000 - - \$ 16,000		

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
311	NEMT Insurance DE LLC, Series 1	ModivCare Solutions, LLC	2373	2/2/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
312	NEMT Insurance, DE LLC	ModivCare Solutions, LLC	2375	2/2/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
313	NEMT Insurance, LLC	ModivCare Solutions, LLC	2376	2/2/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
314	Nichols, David	ModivCare Inc.	1935	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - 114 \$ 114
315	Nichols, Jeffquez Lyntwun	ModivCare Inc.	2400	2/4/2026	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
316	Nichols, Shatina	ModivCare Inc.	2394	2/4/2026	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
317	Nocktonick, Beverly	ModivCare Inc.	1787	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
318	Noga, MichaelAnthony	ModivCare Inc.	1707	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - 100,000,000 \$ 100,000,000
319	Octopus Deploy Pty, Ltd.	ModivCare Solutions, LLC	1997	10/24/2025	General Unsecured Priority Secured Admin Priority Total	3,600 - - - \$ 3,600
320	Ogunyemi, Oladipupo	ModivCare Inc.	1970	10/20/2025	General Unsecured Priority Secured Admin Priority Total	2,018 - - - \$ 2,018

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
321	Ogunyemi, Oladipupo	ModivCare Inc.	2253	1/12/2026	General Unsecured Priority Secured Admin Priority Total	2,018 - - - \$ 2,018
322	Ordaz, Carmen	ModivCare Inc.	2000	10/25/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
323	Orzoria, Kelly	ModivCare Inc.	1791	10/4/2025	General Unsecured Priority Secured Admin Priority Total	525 - - - \$ 525
324	Osbourne, Kelsea	ModivCare Solutions, LLC	2164	12/4/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
325	Outland, Dianne	ModivCare Inc.	2318	1/28/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
326	Pacific East Research Inc	ModivCare Inc.	1891	10/13/2025	General Unsecured Priority Secured Admin Priority Total	- - - 5,183 \$ 5,183
327	Patel, Kamlesh	ModivCare Inc.	2308	1/27/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
328	Patel, Meher	Provado Technologies, LLC	2003	10/25/2025	General Unsecured Priority Secured Admin Priority Total	35,000 - - - \$ 35,000
329	Patterson, David	ModivCare Inc.	2335	1/30/2026	General Unsecured Priority Secured Admin Priority Total	700 13,850 - 3,400 \$ 17,950
330	Patterson, David Troy	ModivCare Inc.	2333	1/30/2026	General Unsecured Priority Secured Admin Priority Total	- 18,850 - - \$ 18,850

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
331	Patton, Torrey	ModivCare Inc.	1841	10/8/2025	General Unsecured Priority Secured Admin Priority Total	- - - 500 \$ 500
332	Peak, Ericka	ModivCare Solutions, LLC	1977	10/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
333	Pearson, Kenneth	ModivCare Inc.	1907	10/14/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
334	Pelt, Carla	ModivCare Inc.	2067	11/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
335	Pelletier, Taylor	ModivCare Inc.	1888	10/13/2025	General Unsecured Priority Secured Admin Priority Total	- - - 1,000 \$ 1,000
336	Penelec	Caregivers America, LLC.	1789	10/6/2025	General Unsecured Priority Secured Admin Priority Total	189 - - - \$ 189
337	Perdomo, Nick	ModivCare Inc.	1988	10/23/2025	General Unsecured Priority Secured Admin Priority Total	1,333 - - - \$ 1,333
338	Perry, Hannah	ModivCare Solutions, LLC	1753	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
339	Person, Jamell	ModivCare Solutions, LLC	2324	1/29/2026	General Unsecured Priority Secured Admin Priority Total	- 4,451 - - \$ 4,451
340	Pettit	ModivCare Inc.	2240	1/12/2026	General Unsecured Priority Secured Admin Priority Total	679 - - - \$ 679

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
341	Phillips, April	ModivCare Inc.	1783	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
342	Pilgrim, Ronald	ModivCare Inc.	1917	10/15/2025	General Unsecured Priority Secured Admin Priority Total	232 - - - \$ 232
343	Pinzon, Jimmy	ModivCare Inc.	1754	10/3/2025	General Unsecured Priority Secured Admin Priority Total	200 - - - \$ 200
344	Pitney Bowes Global Financial Services LLC	ModivCare Inc.	2279	1/20/2026	General Unsecured Priority Secured Admin Priority Total	59,847 - - - \$ 59,847
345	Pizzitola, Rebecca	ModivCare Inc.	2290	1/22/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
346	PK TRANSPORTATION LLC	ModivCare Solutions, LLC	2114	11/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - 12,000 \$ 12,000
347	Plesko, Jenna	ModivCare Inc.	2429	2/5/2026	General Unsecured Priority Secured Admin Priority Total	218 - - - \$ 218
348	Podwils, Eilene	ModivCare Inc.	2239	1/6/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
349	Pollard, Keesha	All Metro Home Care Services of New York, Inc.	2153	12/2/2025	General Unsecured Priority Secured Admin Priority Total	- 12,000 - - \$ 12,000
350	Porter, Ian	ModivCare Inc.	1760	10/5/2025	General Unsecured Priority Secured Admin Priority Total	- - - 6,895 \$ 6,895

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
351	Pratt, Hollie	ModivCare Solutions, LLC	2358	2/4/2026	General Unsecured Priority Secured Admin Priority Total	- 13,500 - - \$13,500
352	Pressley, Michele	ModivCare Inc.	1748	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
353	Price, Ramona	ModivCare Solutions, LLC	1770	10/6/2025	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
354	Prisma Health Ambulance Service	ModivCare Inc.	2383	2/3/2026	General Unsecured Priority Secured Admin Priority Total	6,648 - - - \$ 6,648
355	PROFESSIONAL MEDICAL TRANSPORTATION CORP	ModivCare Inc.	1961	10/19/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
356	Pulummi Corporation	ModivCare Solutions, LLC	1963	10/20/2025	General Unsecured Priority Secured Admin Priority Total	306,000 - - - \$ 306,000
357	Quintana, Adam	ModivCare Inc.	1731	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- 2,500 - - \$ 2,500
358	Ramautar, Nicole	All Metro Aids Inc.	2084	11/12/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
359	Ramirez, Rogelio	ModivCare Inc.	1905	10/14/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
360	Ramos, Monica	ModivCare Inc.	2174	12/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
361	Ramsey, Camilla	ModivCare Inc.	1985	10/22/2025	General Unsecured Priority Secured Admin Priority Total	35,000 - - - \$35,000
362	Raper, Linda	Metropolitan Medical Transportation IPA, LLC	2065	11/10/2025	General Unsecured Priority Secured Admin Priority Total	- - 194 - \$ 194
363	Rawlins, Maya	ModivCare Inc.	2309	1/27/2026	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
364	REACH Air Medical Services LLC	ModivCare Inc.	2423	2/5/2026	General Unsecured Priority Secured Admin Priority Total	331,428 - - - \$ 331,428
365	Reed, Sequoia Marie	ModivCare Solutions, LLC	2209	12/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - - -
366	Reeder, Pamela	ModivCare Inc.	2186	12/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - - -
367	Rehrig, Jennifer	ModivCare Inc.	1818	10/7/2025	General Unsecured Priority Secured Admin Priority Total	1,500 - - - \$ 1,500
368	Rehrig, Nikki	CareGivers America Home Health Services, LLC	1817	10/7/2025	General Unsecured Priority Secured Admin Priority Total	1,200 - - - \$ 1,200
369	Reinsburrow, Danelle	Caregivers America, LLC.	2007	10/26/2025	General Unsecured Priority Secured Admin Priority Total	- 3,500 - - \$ 3,500
370	Reinsburrow, Joshua	ModivCare Inc.	2005	10/26/2025	General Unsecured Priority Secured Admin Priority Total	- 3,500 - - \$ 3,500

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
371	Renaud, Michelle	ModivCare Inc.	2242	1/10/2026	General Unsecured Priority Secured Admin Priority Total	- - 1,234 \$ 1,234
372	RESEARCH DATA GROUP INC	ModivCare Solutions, LLC	2116	11/21/2025	General Unsecured Priority Secured Admin Priority Total	11,373 - - \$ 11,373
373	Rhymer, Helena	ModivCare Inc.	2171	12/9/2025	General Unsecured Priority Secured Admin Priority Total	- - - 2,000 \$ 2,000
374	Rice, Phyllis	ModivCare Inc.	2100	11/14/2025	General Unsecured Priority Secured Admin Priority Total	- - - -
375	Richard, Robert	ModivCare Inc.	2256	1/13/2026	General Unsecured Priority Secured Admin Priority Total	- - - -
376	Rivers, Mindy	ModivCare Inc.	1919	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - -
377	Roberson, Turnell R	ModivCare Inc.	1884	10/10/2025	General Unsecured Priority Secured Admin Priority Total	- - 824 \$ 824
378	Robertson, Georgina	All Metro Field Service Workers Payroll Services Corporation	2064	11/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - -
379	Robinson, Lorene	VRI Intermediate Holdings, LLC	1852	10/8/2025	General Unsecured Priority Secured Admin Priority Total	- - - -
380	Rodgers, Rosie	ModivCare Inc.	2184	12/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - -

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
381	Rollyson, Barry	ModivCare Solutions, LLC	1950	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - 65 \$ 65
382	Roman, Jasmine	ModivCare Inc.	2178	12/13/2025	General Unsecured Priority Secured Admin Priority Total	800 - - - \$ 800
383	Rowe, Jennifer	ModivCare Inc.	2249	1/13/2026	General Unsecured Priority Secured Admin Priority Total	2,000 - - - 2,000
384	Roy, Keiffer	ModivCare Inc.	1922	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ 2,000
385	Rubin, Lisa	ModivCare Solutions, LLC	1920	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - 276 \$ 276
386	Rufenacht, Leslie	ModivCare Inc.	2433	2/5/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
387	Sallaj, Lisa	ModivCare Inc.	2004	10/25/2025	General Unsecured Priority Secured Admin Priority Total	550,000 - - - \$ 550,000
388	Sandrock, Moira	ModivCare Inc.	2288	1/21/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
389	Santiago, Tomasita	ModivCare Solutions, LLC	1901	10/13/2025	General Unsecured Priority Secured Admin Priority Total	- - - 250 \$ 250
390	Sapp, Karen	ModivCare Inc.	1774	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
391	Schemansky, Christy/D	ModivCare Inc.	2210	12/22/2025	General Unsecured Priority Secured Admin Priority Total	- 9,700 - - \$ 9,700 1,000
392	Scott, Amanda	ModivCare Inc.	1974	10/20/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ 1,000 260
393	Sexton, Serena	ModivCare Inc.	1944	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ 260 7,350
394	SH Transport	ModivCare Solutions, LLC	2420	2/4/2026	General Unsecured Priority Secured Admin Priority Total	- - - \$ 7,350 300,000
395	Shapiro, Marc L.	ModivCare Inc.	2151	12/1/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ 300,000 500
396	Shaw, Melissa	ModivCare Inc.	1933	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ - 500
397	Shelton, Neshia	ModivCare Inc.	2347	2/2/2026	General Unsecured Priority Secured Admin Priority Total	- - - \$ 500 -
398	Shelton, Sheila	ModivCare Inc.	2038	11/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ - -
399	Shires, Alyssa	ModivCare Inc.	1687	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ - -
400	Shirk, Monica	ModivCare Inc.	1764	10/5/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ - -

Appendix 2

Objection Procedures

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	x	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	x	

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors² may file omnibus objections (each, an “*Omnibus Objection*”) to Claims on the grounds that such Claims, in part or in whole:

- (a) are inconsistent with the Reorganized Debtors’ books and records;
- (b) fail to specify the asserted Claim amount (or only list the Claim amount as “unliquidated”);
- (c) seek recovery of amounts for which the Reorganized Debtors are not liable;
- (d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors’ Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;
- (e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;
- (f) fail to specify a Reorganized Debtor against which the Claim is asserted;

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the “*Motion*”).

- (g) are disallowed pursuant to section 502 of the Bankruptcy Code;
- (h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;
- (i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;
- (j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the “*Withdrawal Form*”) available on the Claims and Noticing Agent’s website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);
- (k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;
- (l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors’ insurers (in which case the details of payments must be included with the Omnibus Objection); or
- (m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the rescission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors’ objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

- (a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;
- (b) the asserted amount of the Claim;
- (c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;
- (d) a summary of the grounds for the objection;
- (e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and
- (f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "**Order**") as Exhibit 2 (the "**Objection Notice**"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

- (a) adequately describe the nature of the objection;
- (b) inform Holders that their rights may be affected by the objection;
- (c) describe the procedures for filing a written response (each, a "**Response**") to the objection, including all relevant dates and deadlines related thereto;
- (d) identify the hearing date, if applicable, and related information; and
- (e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "**Response Procedures**") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and
- (c) the following contact information for the responding party:
 - (i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov/>.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit T

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

----- X
 :
 In re: : Chapter 11
 :
 MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

NOTICE OF REORGANIZED DEBTORS’ SEVENTH OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Claimants receiving this notice (this “Notice”) should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by April 25, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the “*Reorganized Debtors*”) have filed the Objection attached hereto as **Appendix 1** (the “*Omnibus Objection*”) to your claim(s).²

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf is deficient because: the Proof of Claim was not timely filed by the deadline set by the Court.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Omnibus Objection.

disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "**Response**") with the United States Bankruptcy Court for the Southern District of Texas (the "**Court**") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **April 25, 2026, at 4:00 p.m. (prevailing Central Time)**.

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at <https://www.txs.uscourts.gov> or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **April 25, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to **disallow and expunge** your Claim(s) based on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in the Chapter 11 Cases (the "**Objection Procedures**").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures requires that each Response must contain the following information (at a minimum):

a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

the following contact information for the responding party:

the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **April 25, 2026**, at 4:00 p.m. (prevailing Central Time) unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov>. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

----- X
 :
 In re: : Chapter 11
 :
 MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

**REORGANIZED DEBTORS' SEVENTH
OMNIBUS OBJECTION TO CERTAIN CLAIMS (LATE-FILED CLAIMS)**

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THE BANKRUPTCY CASE. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED WITHOUT A HEARING.

TO THE CLAIMANTS WHOSE CLAIMS ARE SUBJECT TO THIS OBJECTION:

YOUR SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND ANY FURTHER OBJECTIONS THAT MAY BE FILED IN THE CHAPTER 11 CASES.

THE RELIEF SOUGHT IN THIS OBJECTION IS WITHOUT PREJUDICE TO THE RIGHTS OF THE REORGANIZED DEBTORS AND THEIR ESTATES OR OTHER PARTIES IN INTEREST TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED HEREIN AND OTHER CLAIMS FILED IN THE CHAPTER 11 CASES.

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

The above-captioned reorganized debtors (prior to the Effective Date,² collectively, the “*Debtors*” and after the Effective Date, collectively, the “*Reorganized Debtors*”) respectfully state the following in support of this omnibus claims objection (this “*Objection*”).

RELIEF REQUESTED

1. By this Objection, the Reorganized Debtors seek entry of an order substantially in the form attached hereto (the “*Proposed Order*”) disallowing the claims listed on **Schedule 1** (the “*Late-Filed Claims*”) to the Proposed Order in their entirety because each of the Late-Filed Claims was filed after the applicable Claims Bar Date.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the “*Court*”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution.

3. Each of the Late-Filed Claims that are the subject of this Objection were asserted on proof of claim forms (each a “*Proof of Claim*” and collectively the “*Claim Forms*”) filed with the Claims and Noticing Agent (as defined below). By seeking recovery from the Reorganized Debtors’ estates based on the filing of a Proof of Claim, the holders of the Late-Filed Claims (each a “*Claimant*” and collectively the “*Claimants*”) have submitted to the Court’s jurisdiction over this matter.

4. Venue of the Chapter 11 Cases and this Objection in this district is proper under 28 U.S.C. §§ 1408 and 1409.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1055, Ex. A] (together with all supplemental or supporting documentation related thereto, the “*Plan*”), as applicable.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “**Bankruptcy Local Rules**”), and the Procedures for Complex Cases in the Southern District of Texas.

BACKGROUND

6. On August 20, 2025, the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered, for procedural purposes only, pursuant to Rule 1015(b) of the Bankruptcy Rules and Rule 1015-1 of the Bankruptcy Local Rules. The factual background regarding the Debtors, including their business, their capital structure, and the events leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First-Day Relief* [Docket No. 14].

7. On December 15, 2025, the Court entered the Confirmation Order³ which, among other things, confirmed the Plan. The Effective Date occurred on December 29, 2025.

CLAIMS RECONCILIATION PROCESS

8. On August 21, 2025, the Court entered the *Order Establishing (A) Bar Dates and Related Procedures for Filing Proofs of Claim; (B) Approving the Form and Manner of Notice Thereof; and (C) Granting Related Relief* [Docket No. 66] (the “**Claims Bar Date Order**”) setting, *inter alia*, October 1, 2025, as the deadline for non-governmental creditors and interest holders to file claims in the Chapter 11 Cases (the “**General Bar Date**”).

³ Docket No. 1055.

9. The deadline for all governmental units asserting a “claim” (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose on or prior to the Petition Date to file a Proof of Claim on account of such claim was February 16, 2026, at 5:00 p.m. (prevailing Central Time) (the “**Governmental Bar Date**” and together with the General Bar Date, as applicable depending on whether the claimant is a governmental unit or non-governmental unit, the “**Claims Bar Date**”).

10. The Claims Bar Date Order establishes certain requirements that a filed claim must satisfy to be considered valid. A filed claim must, among other things, “set forth with specificity the legal and factual basis for the alleged claim,” and “include supporting documentation or an explanation as to why such documentation is not available.” Claims Bar Date Order, ¶ 7. If such filed claims are not properly submitted prior to the Claims Bar Date, the Claims Bar Date Order provides that the relevant claimant “shall not be treated as a creditor with respect to such claim for purposes of voting and **distribution**.” *Id.* at ¶ 20 (emphasis added).

11. On August 23, 2025, the Reorganized Debtors’ claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global (the “**Claims and Noticing Agent**”), mailed notice of the Claims Bar Date (the “**Bar Date Notice**”) to potential claimants in accordance with the procedures set forth in the Claims Bar Date Order. *See Affidavit of Service* [Docket No. 98]. Also, as certified at Docket No. 142, in accordance with the Claims Bar Date Order, the Reorganized Debtors published the Bar Date Notice in *The New York Times* on August 26, 2025. *See Affidavit of Publication of the Notice of Deadline for the Filing of Proofs of Claim, Including for Claims Asserted Under Section 503(b)(9) of the Bankruptcy Code in the New York Times* [Docket No. 142].

12. The Reorganized Debtors also listed numerous claims in their Schedules⁴ (such claims, along with the claims asserted in each proof of claim filed in the Chapter 11 Cases, collectively, the “**Claims**”), some of which have been satisfied under the authority granted to the Reorganized Debtors pursuant to certain “first day” orders and other orders entered in these Chapter 11 Cases. A database of all Claims is being maintained by the Reorganized Debtors’ Claims and Noticing Agent (the “**Claims Register**”).⁵ Pursuant to the Plan, the Claims Objection Deadline is currently, subject to the Reorganized Debtors’ right to seek a further extension of such deadline in accordance with the Plan,⁶ March 29, 2026 (*i.e.*, the date that is ninety (90) days after the occurrence of the Effective Date).⁷

13. On February 19, 2026, the Court entered the *Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1313] (the “**Omnibus Objection Procedures Order**”) approving the procedures for filing and resolving omnibus objections to Claims asserted against the Reorganized Debtors in the Chapter 11 Cases appended to the Omnibus Objection Procedures Order as Exhibit 1 (the “**Objection Procedures**”). The Objection Notice (as defined in the Objection Procedures) and the Objection Procedures will be served on the holders of the Late-Filed Claims along with this Objection.

⁴ On September 7, 2025, the Reorganized Debtors filed their respective schedules of assets and liabilities (the “**Schedules**”) and statements of financial affairs [Docket Nos. 177–322], pursuant to Bankruptcy Rule 1007.

⁵ Under section 1111(a) of the Bankruptcy Code, scheduled claims are treated as proofs of claim. *See* 11 U.S.C. § 1111(a) (“A proof of claim . . . is deemed filed under section 501 of this title for any claim . . . that appears in the schedules . . . except a claim . . . that is scheduled as disputed, contingent, or unliquidated.”).

⁶ *See* Plan, p. 3 (defining “Claims Objection Deadline” as “ninety (90) days after the Effective Date . . . which dates may be extended pursuant to an order of the Bankruptcy Court upon a motion Filed by the Reorganized Debtors.”).

⁷ The Claims Objection Deadline with respect to claims filed by governmental units is ninety (90) days after the Governmental Bar Date, whereas for claims filed by non-governmental units it is ninety (90) days after the occurrence of the Effective Date.

THE LATE-FILED CLAIMS

14. The Reorganized Debtors' review of the Claims Register allowed them to identify the Late-Filed Claims. This Objection seeks to disallow the Late-Filed Claims in their entirety because each Late-Filed Claim was filed after the applicable Bar Date.

15. As attested to in the *Affidavit of Kenneth Shepard in Support of Debtors' Seventh Omnibus Objection to Certain Claims* attached hereto as **Exhibit A**, based on their review of the Claims Register, the Reorganized Debtors and their advisors identified each Late-Filed Claim on **Schedule 1** to the Proposed Order as being filed after the occurrence of the applicable Claims Bar Date. To identify the Late-Filed Claims, the Reorganized Debtors:

- (a) reviewed the Claims Register to identify instances in which a Claim was submitted after the applicable Claims Bar Date; and
- (b) determined that there were no agreements or other arrangements between the holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the relevant Claims Bar Date.

16. The Reorganized Debtors hereby request that the Late-Filed Claims be disallowed in their entirety and expunged.

BASIS FOR RELIEF

17. Section 502 of the Bankruptcy Code provides, in pertinent part, that: “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest ... objects.” 11 U.S.C. § 502. Moreover, section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed if “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law” 11 U.S.C. § 502(b)(1). Bankruptcy Rule 3007 provides certain grounds upon which “objections to more than one claim may be joined in a single objection.” FED. R. BANKR. P.

3007(d). This includes objections on the grounds that claims should be disallowed because they “were not timely filed.” FED. R. BANKR. P. 3007(d)(2)(D).

18. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g., In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). A proof of claim loses the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim’s legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id.* Despite this shifting burden during the claim objection process, “the ultimate burden of proof always lies with the claimant.” *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Rev.*, 530 U.S. 15 (2000)).

19. Here, the Court established, pursuant to the Claims Bar Date Order, the Claims Bar Date as the deadline by which creditors were required to file a Proof of Claim conforming to the requirements set forth in the Claims Bar Date Order. The Claims Bar Date Order, in turn, expressly provides that the timely filing of a Proof of Claim was a prerequisite “in order to share in the Debtors’ estates,” Claims Bar Date Order, ¶ 5, and expressly provides that a creditor who failed to timely file a Proof of Claim “shall not be treated as a creditor with respect to such claim for purposes of voting and distribution.” *Id.* at ¶ 20. As set forth above, the Late-Filed Claims were not filed by the applicable Claims Bar Date, and, thus, are subject to disallowance under the express terms of the Claims Bar Date Order.

20. Therefore, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Plan, the Reorganized Debtors respectfully request that the Court enter the Proposed Order granting the relief requested herein.

RESERVATION OF RIGHTS

21. The Reorganized Debtors reserve the right to amend, modify, or supplement this Objection, and to file additional objections to any other Claims (filed or not) that may be asserted against the Reorganized Debtors and their estates. Should one or more of the grounds of objection stated in the Objection be dismissed or overruled, the Reorganized Debtors reserve the right to object to each of the Late-Filed Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

22. Nothing contained herein shall be deemed: (a) an admission as to the amount of, basis for, or validity of any Claim against the Reorganized Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any Claim against, or interest in, the Reorganized Debtors, or their property or estates; (c) a promise or requirement to pay any prepetition Claim; (d) an implication or admission that any particular Claim is of a type specified or defined in this Objection, or any order granting the relief requested by this Objection; (e) an implication, admission, or finding as to (i) the validity, enforceability, or perfection of any interest or encumbrance on the property of the Reorganized Debtors or their estates or (ii) the applicability of any exception or exclusion from property of the estate under section 541 of the Bankruptcy Code or other applicable law; (f) an impairment or waiver of any claims or causes of action which may exist against any entity; or (g) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law.

NOTICE

23. Notice of this Objection will be given to the Claimants, the parties on the Reorganized Debtors' Master Service List, and all parties that have requested or that are required to receive notice pursuant to Bankruptcy Rule 2002. The Reorganized Debtors submit that, under the circumstances, no other or further notice is required.

24. A copy of this Objection is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Claims and Noticing Agent at <https://www.veritaglobal.net/ModivCare>.

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter the Proposed Order sustaining the Objection and granting such other and further relief as may be just and proper.

Dated: March 26, 2026

Respectfully submitted,

/s/ Timothy A. ("Tad") Davidson II

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Co-Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on March 26, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II
Timothy A. ("Tad") Davidson II

Exhibit A

Shepard Declaration

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

-----	x
	:
In re:	: Chapter 11
	:
MODIVCARE INC., <i>et al.</i> ,	: Case No. 25-90309 (ARP)
	:
Reorganized Debtors. ¹	: (Jointly Administered)
	:
-----	x

**AFFIDAVIT OF KENNETH SHEPARD
IN SUPPORT OF REORGANIZED DEBTORS’
SEVENTH OMNIBUS OBJECTION TO CERTAIN CLAIMS**

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this “*Affidavit*”) in support of the *Reorganized Debtors’ Seventh Omnibus Objection to Certain Claims* (the “*Objection*”)² pursuant to Rule 3007-1 of the Local Bankruptcy Rules for the Southern District of Texas.

2. I am a senior vice president of finance for the Reorganized Debtors a role that I have served in for approximately two years. I have worked for the Reorganized Debtors for over ten years and in finance for approximately 20 years.

3. I am knowledgeable about, and familiar with, the Reorganized Debtors’ day-to-day operations, business and financial affairs, books and records, and the circumstances that led to the commencement of the Chapter 11 Cases. The facts set forth in this Declaration are based upon

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Objection.

my personal knowledge, my review of relevant documents, information provided to me by employees working under my supervision, my own reasonable inquiry, and/or my discussions with the Reorganized Debtors' other officers, directors, and restructuring advisors, including professionals at Latham & Watkins LLP, Hunton Andrews Kurth LLP, Moelis & Company, FTI Consulting, Inc., and Kurtzman Carson Consultants, LLC d/b/a Verita Global. If called upon to testify, I would testify to the facts set forth in this Affidavit. I am authorized to submit this Affidavit.

OBJECTION TO LATE-FILED CLAIMS

4. Article VII of the Plan empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified certain Late-Filed Claims which they seek the disallowance of in their entirety.

5. The Late-Filed Claims were identified after the Reorganized Debtors:
- (a) reviewed the Claims Register to identify instances in which more a Claim was submitted after the applicable Bar Date; and
 - (b) determined that there were no agreements or other arrangements between the Holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the Claims Bar Date.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 26, 2026

/s/ Kenneth Shepard

Name: Kenneth Shepard

Title: Senior Vice President – Finance
ModivCare Solutions, LLC and its
Reorganized Debtor Affiliates

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	x	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	x	

**ORDER GRANTING REORGANIZED DEBTORS’
SEVENTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**
[Relates to Docket No.]

Upon the objection (the “*Objection*”)² of the Reorganized Debtors seeking entry of an order (this “*Order*”) disallowing the Late-Filed Claims in their entirety as set forth in **Schedule 1** hereto, all as more fully set forth in the Objection; and the Court having reviewed the Objection; and the Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and that no other or further notice is necessary, except as set forth in this Order; and all responses, if any, to the Objection having been withdrawn, resolved, or overruled; and upon the record herein; and upon the record herein; and after due deliberation

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Objection.

thereon; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Objection is in the best interests of the Reorganized Debtors, their estates, their creditors, and other parties in interest, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is GRANTED, as set forth herein.
2. Each Late-Filed Claim listed on Schedule 1 is disallowed and expunged in its entirety.
3. The Claims and Noticing Agent is authorized to update the claims register maintained in the Chapter 11 Cases to reflect the relief granted in this Order.
4. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in the Objection or this Order shall be deemed a waiver of the rights of the Reorganized Debtors to object to any Claim, and shall not constitute an admission of liability by the Reorganized Debtors with respect to any Proof of Claim or application for administrative expenses.
5. Each Late-Filed Claim and the Reorganized Debtors' objections to each Late-Filed Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Late-Filed Claim.
6. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any Claim against the Reorganized Debtors; (b) as a waiver of the Reorganized Debtors' rights to dispute or otherwise object to any Claim on any grounds or basis; or (c) to waive or release any right, claim, defense, or counterclaim of the Reorganized Debtors,

or to estop the Reorganized Debtors from asserting any right, claim, defense, or counterclaim (including setoff).

7. Notice of the Objection as provided therein shall be deemed good and sufficient and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

8. Notwithstanding any applicable Bankruptcy Rules to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon its entry.

9. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Objection.

10. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____, 2026

UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

Late Filed Claims 401 - 500						Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Claim Nature	Claim Amount	
401	Shoemaker, Ruth	ModivCare Inc.	1835	10/8/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -	
402	Shrader, Brittany R	ModivCare Inc.	2156	12/2/2025	General Unsecured Priority Secured Admin Priority Total	596 - - - \$ 596	
403	Shrock, Jennifer	ModivCare Inc.	1967	10/18/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -	
404	Shubalis, Hailey	ModivCare Inc.	1966	10/17/2025	General Unsecured Priority Secured Admin Priority Total	1,500 - - - \$ 1,500	
405	Sibert, Barbara	CareGivers America Home Health Services, LLC	2076	11/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -	
406	Simmons, Samuel	ModivCare Inc.	2214	12/23/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -	
407	Simms, Tyliesha	ModivCare Inc.	2012	10/27/2025	General Unsecured Priority Secured Admin Priority Total	- 21,406 5,307 2,100 \$ 28,813	
408	Simon, Mary	ModivCare Inc.	1890	10/13/2025	General Unsecured Priority Secured Admin Priority Total	700 - - - \$ 700	
409	Sims, Joyce	ModivCare Inc.	1739	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -	
410	Stores, Jeronimo	ModivCare Inc.	2317	1/27/2026	General Unsecured Priority Secured Admin Priority Total	- 11,068 - - \$ 11,068	

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
411	Smith, Chassity	ModivCare Inc.	2260	1/13/2026	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
412	Smith, Dalilah	ModivCare Inc.	1765	10/6/2025	General Unsecured Priority Secured Admin Priority Total	2,000 - - \$ 2,000
413	Smith, John	ModivCare Inc.	1942	10/16/2025	General Unsecured Priority Secured Admin Priority Total	200 - - \$ 200
414	Smith, Leonora	ModivCare Inc.	1875	10/12/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
415	Smith, Paulette	All Metro Home Care Services of New York, Inc.	2271	1/18/2026	General Unsecured Priority Secured Admin Priority Total	- 2,000 - \$ 2,000
416	Solis Bravo, Mayra	Care Finders Total Care LLC	2072	11/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
417	SPECIALTEE TRANSPORTATION	ModivCare Inc.	1862	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
418	Spencer, Angela	ModivCare Inc.	2119	11/23/2025	General Unsecured Priority Secured Admin Priority Total	1,756 - - \$ 1,756
419	Stacy, Timothy	ModivCare Solutions, LLC	2006	10/26/2025	General Unsecured Priority Secured Admin Priority Total	- - 1,420 \$ 1,420
420	Steelman, Stephanie	ModivCare Inc.	2111	11/20/2025	General Unsecured Priority Secured Admin Priority Total	130 - - \$ 130

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
421	Stegall, William	ModivCare Solutions, LLC	2236	1/5/2026	General Unsecured Priority Secured Admin Priority Total	5,000 - - \$ 5,000
422	Stember, Sewe	ModivCare Solutions, LLC	2267	1/15/2026	General Unsecured Priority Secured Admin Priority Total	3,500 - - \$ 3,500
423	Stephens, James Oliver	ModivCare Solutions, LLC	2356	2/3/2026	General Unsecured Priority Secured Admin Priority Total	750,000 - - \$ 750,000
424	Stewart, Adeline	ModivCare Inc.	1747	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
425	Stone Kalfus LLP	ModivCare Inc.	2068	11/10/2025	General Unsecured Priority Secured Admin Priority Total	2,030 - - \$ 2,030
426	Stone, Ashley	ModivCare Solutions, LLC	1871	10/11/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
427	Study, Carolyn	ModivCare Inc.	2357	2/3/2026	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
428	Sullivan, Christy Kimiko	Ride Plus, LLC	1865	10/9/2025	General Unsecured Priority Secured Admin Priority Total	23,000 - - \$ 23,000
429	Sullivan, David	ModivCare Inc.	2176	12/11/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
430	Summerville, Mary	ModivCare Inc.	2056	11/4/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
431	Superior Air-Ground Ambulance Service, Inc.	ModivCare Inc.	2104	11/17/2025	General Unsecured Priority Secured Admin Priority Total	731,714 - - \$ 731,714
432	SUPERIOR MEDICAL TRANSPORTATION LLC	ModivCare Inc.	2090	11/5/2025	General Unsecured Priority Secured Admin Priority Total	- - 2,500,000 \$ 2,500,000
433	Sutherland, Christopher Lee	ModivCare Inc.	2112	11/20/2025	General Unsecured Priority Secured Admin Priority Total	- 5,000,000 - \$ 5,000,000
434	Swick, Heather	ModivCare Solutions, LLC	2025	10/30/2025	General Unsecured Priority Secured Admin Priority Total	- - - 8,000,000
435	Swick, Kevin	ModivCare Inc.	1838	10/8/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ 8,000,000
436	Sykes, Lisa	ModivCare Inc.	1876	10/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
437	Tarby, Tracy	ModivCare Solutions, LLC	1941	10/16/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
438	Taylor, Christine	ModivCare Inc.	1851	10/8/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
439	Teagle, Angie R	ModivCare Inc.	2293	1/23/2026	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
440	Telos Actuarial, LLC	ModivCare Inc.	1824	10/7/2025	General Unsecured Priority Secured Admin Priority Total	15,361 - - \$ 15,361

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
441	The Sabine Council on Aging, Inc.	ModivCare Inc.	2285	1/21/2026	General Unsecured Priority Secured Admin Priority Total	2,635 - - \$ 2,635
442	THE TRANSIT SYSTEM INC	ModivCare Inc.	2069	11/10/2025	General Unsecured Priority Secured Admin Priority Total	15,632 - - \$ 15,632
443	Theriault, Bonnie	ModivCare Inc.	1932	10/16/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
444	Thomas, Beverly	ModivCare Inc.	2125	11/24/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
445	Thomas, Cyncerie	ModivCare Inc.	2071	11/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$ -
446	Thomas, Shawn	ModivCare Inc.	1797	10/6/2025	General Unsecured Priority Secured Admin Priority Total	550 2,000 - \$ 2,550
447	Thompson, Maria	ModivCare Inc.	1826	10/7/2025	General Unsecured Priority Secured Admin Priority Total	3,982 - - \$ 3,982
448	Thompson, Victoria	ModivCare Inc.	2299	1/26/2026	General Unsecured Priority Secured Admin Priority Total	- - 982 \$ 982
449	Toothaker, Garrett	ModivCare Inc.	1735	10/3/2025	General Unsecured Priority Secured Admin Priority Total	1,417 - - \$ 1,417
450	Torres, Amida	ModivCare Inc.	1756	10/4/2025	General Unsecured Priority Secured Admin Priority Total	- - 600 \$ 600

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
451	Travelers	ModivCare Inc.	1742	10/3/2025	General Unsecured Priority Secured Admin Priority Total	66,162 - 3,202,105 - \$ 3,268,267
452	Travis, Whitney Leigh	ModivCare Inc.	2103	11/17/2025	General Unsecured Priority Secured Admin Priority Total	- 707 - - \$ 707
453	Travis, Yvonne	ModivCare Inc.	2086	11/12/2025	General Unsecured Priority Secured Admin Priority Total	2,100 - - - \$ 2,100
454	TRUE TO CARE LLC	ModivCare Inc.	2059	11/6/2025	General Unsecured Priority Secured Admin Priority Total	8,620 - - - \$ 8,620
455	Tunstall, Antonette	ModivCare Inc.	1793	10/6/2025	General Unsecured Priority Secured Admin Priority Total	5,750 4,200 - - \$ 9,950
456	Turner, Natasha	ModivCare Inc.	1800	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
457	Ulysse, Iselaine	ModivCare Inc.	2345	2/2/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
458	Underwood, Yoianda	ModivCare Inc.	2363	2/4/2026	General Unsecured Priority Secured Admin Priority Total	- 1,000,000 1,500,000 - \$ 2,500,000
459	Vagnetti, Jeffrey	Caregivers America, LLC.	1839	10/8/2025	General Unsecured Priority Secured Admin Priority Total	604 - - - \$ 604
460	Valenzuela, Shadoc	ModivCare Inc.	1758	10/4/2025	General Unsecured Priority Secured Admin Priority Total	- 500,000 - - \$ 500,000

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
461	Vance, Francis	ModivCare Solutions, LLC	1931	10/16/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ - 4,746 - -
462	Veloz, Berenice	CareGivers America Home Health Services, LLC	2150	12/1/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ - 4,746 - -
463	Venglevska, Mariela	ModivCare Inc.	2070	11/10/2025	General Unsecured Priority Secured Admin Priority Total	16 - - -	16 - - -
464	VERIFIED FIRST LLC	ModivCare Inc.	1955	10/16/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ 16 15,461 - -
465	VERIFIED FIRST LLC	Caregivers America, LLC.	1954	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	7,575 - - -
466	VERIFIED FIRST LLC	Care Finders Total Care LLC	1952	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ 7,575 3,988 - -
467	VERIFIED FIRST LLC	All Metro Home Care Services of New York, Inc.	1953	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	1,707 - - -
468	VERIFIED FIRST LLC	A & B Homecare Solutions, L.L.C.	1951	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ 1,229 - - -
469	VERIFIED FIRST LLC	Multicultural Home Care Inc.	1956	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	\$ 1,229 779 - -
470	VERIFIED FIRST LLC	Panhandle Support Services, Inc.	1957	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - -	202 - - -
							\$ 202

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
471	VERIFIED FIRST LLC	All Metro Home Care Services of Florida, Inc.	1943	10/17/2025	General Unsecured	91
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 91
472	VERIFIED FIRST LLC	ModivCare Inc.	1949	10/17/2025	General Unsecured	32
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 32
473	Vigli, Miguel Avelardo and Vigil, Lilita	ModivCare Solutions, LLC	2169	12/3/2025	General Unsecured	850
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 850
474	Virginia Medical Transport, LLC	ModivCare Inc.	2410	2/4/2026	General Unsecured	2,056
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 2,056
475	WALDRON & COMPANY, INC.	ModivCare Inc.	2033	11/2/2025	General Unsecured	1,000
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 1,000
476	Waldron and Company Inc.	ModivCare Inc.	2304	1/27/2026	General Unsecured	1,000
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 1,000
477	Walker, Gwendolyn A	ModivCare Inc.	1772	10/6/2025	General Unsecured	-
					Priority	-
					Secured	-
					Admin Priority	-
					Total	4,000
478	Walker, Gwendolyn A	ModivCare Inc.	2216	12/23/2025	General Unsecured	-
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 4,000
479	Watson, Ryan	ModivCare Inc.	2137	11/26/2025	General Unsecured	1,780
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ 1,780
480	Watts, Jennifer	ModivCare Inc.	2085	11/12/2025	General Unsecured	-
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$ -

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
481	WES Corporation Inc	ModivCare Inc.	2430	2/5/2026	General Unsecured	34,361
					Priority	17,150
					Secured	-
					Admin Priority	-
					Total	\$51,511
482	WestFax, Inc.	ModivCare Inc.	2013	10/28/2025	General Unsecured	2,610
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$2,610
483	Westmed Ambulance, Inc.	ModivCare Inc.	2402	2/4/2026	General Unsecured	99,086
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$99,086
484	Whetstone, Carolyn Y	ModivCare Inc.	2023	10/29/2025	General Unsecured	-
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$-
485	White, Lillie M	ModivCare Solutions, LLC	2154	12/2/2025	General Unsecured	15,456
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$15,456
486	White, Shanel L	ModivCare Solutions, LLC	2095	11/14/2025	General Unsecured	-
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$-
487	White, Stephanie	ModivCare Solutions, LLC	1882	10/12/2025	General Unsecured	378
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$378
488	Whitney, Laree	ModivCare Inc.	1982	10/21/2025	General Unsecured	-
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$-
489	Williams, Carla and Hackworth, Rodrick	ModivCare Solutions, LLC	1915	10/15/2025	General Unsecured	1,000,000
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$1,000,000
490	Williams, Carlton Jr	ModivCare Inc.	1820	10/7/2025	General Unsecured	-
					Priority	-
					Secured	-
					Admin Priority	-
					Total	\$-

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
491	Williams, LeMarcus	ModivCare Inc.	2255	1/13/2026	General Unsecured Priority Secured Admin Priority Total	42 - - - \$ 42
492	Williams, Mikayla	ModivCare Solutions, LLC	1798	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- 500 - - \$ 500
493	Williams, Sheretta	ModivCare Inc.	2295	1/24/2026	General Unsecured Priority Secured Admin Priority Total	17,850 17,150 - - \$ 35,000
494	Williams, Sherry	ModivCare Inc.	1998	10/27/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
495	Williams, Stephanie	ModivCare Solutions, LLC	2149	12/1/2025	General Unsecured Priority Secured Admin Priority Total	279 - - - \$ 279
496	Willis, Ronnie	ModivCare Solutions, LLC	1904	10/14/2025	General Unsecured Priority Secured Admin Priority Total	- 3,000 - - \$ 3,000
497	Wilson, Ambrosia	ModivCare Solutions, LLC	1873	10/11/2025	General Unsecured Priority Secured Admin Priority Total	200 - - - \$ 200
498	Withrow, Jerry	ModivCare Inc.	1885	10/10/2025	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
499	Woodley, Tori	ModivCare Inc.	2055	11/5/2025	General Unsecured Priority Secured Admin Priority Total	350 - - - \$ 350
500	Woodley, Tori	ModivCare Inc.	2323	1/28/2026	General Unsecured Priority Secured Admin Priority Total	350 - - - \$ 350

Appendix 2

Objection Procedures

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	x	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	x	

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors² may file omnibus objections (each, an “*Omnibus Objection*”) to Claims on the grounds that such Claims, in part or in whole:

- (a) are inconsistent with the Reorganized Debtors’ books and records;
- (b) fail to specify the asserted Claim amount (or only list the Claim amount as “unliquidated”);
- (c) seek recovery of amounts for which the Reorganized Debtors are not liable;
- (d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors’ Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;
- (e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;
- (f) fail to specify a Reorganized Debtor against which the Claim is asserted;

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the “*Motion*”).

- (g) are disallowed pursuant to section 502 of the Bankruptcy Code;
- (h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;
- (i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;
- (j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the “*Withdrawal Form*”) available on the Claims and Noticing Agent’s website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);
- (k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;
- (l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors’ insurers (in which case the details of payments must be included with the Omnibus Objection); or
- (m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the rescission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors’ objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

- (a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;
- (b) the asserted amount of the Claim;
- (c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;
- (d) a summary of the grounds for the objection;
- (e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and
- (f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "**Order**") as Exhibit 2 (the "**Objection Notice**"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

- (a) adequately describe the nature of the objection;
- (b) inform Holders that their rights may be affected by the objection;
- (c) describe the procedures for filing a written response (each, a "**Response**") to the objection, including all relevant dates and deadlines related thereto;
- (d) identify the hearing date, if applicable, and related information; and
- (e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "**Response Procedures**") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and
- (c) the following contact information for the responding party:
 - (i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov/>.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit U

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

----- X
 :
 In re: : Chapter 11
 :
 MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

NOTICE OF REORGANIZED DEBTORS’ EIGHTH OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Claimants receiving this notice (this “Notice”) should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by April 25, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the “*Reorganized Debtors*”) have filed the Objection attached hereto as **Appendix 1** (the “*Omnibus Objection*”) to your claim(s).²

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf is deficient because: the Proof of Claim was not timely filed by the deadline set by the Court.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Omnibus Objection.

disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "**Response**") with the United States Bankruptcy Court for the Southern District of Texas (the "**Court**") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **April 25, 2026, at 4:00 p.m. (prevailing Central Time)**.

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at <https://www.txs.uscourts.gov> or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **April 25, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to **disallow and expunge** your Claim(s) based on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in the Chapter 11 Cases (the "**Objection Procedures**").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures requires that each Response must contain the following information (at a minimum):

a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

the following contact information for the responding party:

the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **April 25, 2026**, at 4:00 p.m. (prevailing Central Time) unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov>. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	X	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	X	

**REORGANIZED DEBTORS' EIGHTH
OMNIBUS OBJECTION TO CERTAIN CLAIMS (LATE-FILED CLAIMS)**

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THE BANKRUPTCY CASE. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED WITHOUT A HEARING.

TO THE CLAIMANTS WHOSE CLAIMS ARE SUBJECT TO THIS OBJECTION:

YOUR SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND ANY FURTHER OBJECTIONS THAT MAY BE FILED IN THE CHAPTER 11 CASES.

THE RELIEF SOUGHT IN THIS OBJECTION IS WITHOUT PREJUDICE TO THE RIGHTS OF THE REORGANIZED DEBTORS AND THEIR ESTATES OR OTHER PARTIES IN INTEREST TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED HEREIN AND OTHER CLAIMS FILED IN THE CHAPTER 11 CASES.

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

The above-captioned reorganized debtors (prior to the Effective Date,² collectively, the “*Debtors*” and after the Effective Date, collectively, the “*Reorganized Debtors*”) respectfully state the following in support of this omnibus claims objection (this “*Objection*”).

RELIEF REQUESTED

1. By this Objection, the Reorganized Debtors seek entry of an order substantially in the form attached hereto (the “*Proposed Order*”) disallowing the claims listed on **Schedule 1** (the “*Late-Filed Claims*”) to the Proposed Order in their entirety because each of the Late-Filed Claims was filed after the applicable Claims Bar Date.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the “*Court*”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution.

3. Each of the Late-Filed Claims that are the subject of this Objection were asserted on proof of claim forms (each a “*Proof of Claim*” and collectively the “*Claim Forms*”) filed with the Claims and Noticing Agent (as defined below). By seeking recovery from the Reorganized Debtors’ estates based on the filing of a Proof of Claim, the holders of the Late-Filed Claims (each a “*Claimant*” and collectively the “*Claimants*”) have submitted to the Court’s jurisdiction over this matter.

4. Venue of the Chapter 11 Cases and this Objection in this district is proper under 28 U.S.C. §§ 1408 and 1409.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1055, Ex. A] (together with all supplemental or supporting documentation related thereto, the “*Plan*”), as applicable.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “**Bankruptcy Local Rules**”), and the Procedures for Complex Cases in the Southern District of Texas.

BACKGROUND

6. On August 20, 2025, the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered, for procedural purposes only, pursuant to Rule 1015(b) of the Bankruptcy Rules and Rule 1015-1 of the Bankruptcy Local Rules. The factual background regarding the Debtors, including their business, their capital structure, and the events leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First-Day Relief* [Docket No. 14].

7. On December 15, 2025, the Court entered the Confirmation Order³ which, among other things, confirmed the Plan. The Effective Date occurred on December 29, 2025.

CLAIMS RECONCILIATION PROCESS

8. On August 21, 2025, the Court entered the *Order Establishing (A) Bar Dates and Related Procedures for Filing Proofs of Claim; (B) Approving the Form and Manner of Notice Thereof; and (C) Granting Related Relief* [Docket No. 66] (the “**Claims Bar Date Order**”) setting, *inter alia*, October 1, 2025, as the deadline for non-governmental creditors and interest holders to file claims in the Chapter 11 Cases (the “**General Bar Date**”).

³ Docket No. 1055.

9. The deadline for all governmental units asserting a “claim” (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose on or prior to the Petition Date to file a Proof of Claim on account of such claim was February 16, 2026, at 5:00 p.m. (prevailing Central Time) (the “**Governmental Bar Date**” and together with the General Bar Date, as applicable depending on whether the claimant is a governmental unit or non-governmental unit, the “**Claims Bar Date**”).

10. The Claims Bar Date Order establishes certain requirements that a filed claim must satisfy to be considered valid. A filed claim must, among other things, “set forth with specificity the legal and factual basis for the alleged claim,” and “include supporting documentation or an explanation as to why such documentation is not available.” Claims Bar Date Order, ¶ 7. If such filed claims are not properly submitted prior to the Claims Bar Date, the Claims Bar Date Order provides that the relevant claimant “shall not be treated as a creditor with respect to such claim for purposes of voting and **distribution**.” *Id.* at ¶ 20 (emphasis added).

11. On August 23, 2025, the Reorganized Debtors’ claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global (the “**Claims and Noticing Agent**”), mailed notice of the Claims Bar Date (the “**Bar Date Notice**”) to potential claimants in accordance with the procedures set forth in the Claims Bar Date Order. *See Affidavit of Service* [Docket No. 98]. Also, as certified at Docket No. 142, in accordance with the Claims Bar Date Order, the Reorganized Debtors published the Bar Date Notice in *The New York Times* on August 26, 2025. *See Affidavit of Publication of the Notice of Deadline for the Filing of Proofs of Claim, Including for Claims Asserted Under Section 503(b)(9) of the Bankruptcy Code in the New York Times* [Docket No. 142].

12. The Reorganized Debtors also listed numerous claims in their Schedules⁴ (such claims, along with the claims asserted in each proof of claim filed in the Chapter 11 Cases, collectively, the “*Claims*”), some of which have been satisfied under the authority granted to the Reorganized Debtors pursuant to certain “first day” orders and other orders entered in these Chapter 11 Cases. A database of all Claims is being maintained by the Reorganized Debtors’ Claims and Noticing Agent (the “*Claims Register*”).⁵ Pursuant to the Plan, the Claims Objection Deadline is currently, subject to the Reorganized Debtors’ right to seek a further extension of such deadline in accordance with the Plan,⁶ March 29, 2026 (*i.e.*, the date that is ninety (90) days after the occurrence of the Effective Date).⁷

13. On February 19, 2026, the Court entered the *Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1313] (the “*Omnibus Objection Procedures Order*”) approving the procedures for filing and resolving omnibus objections to Claims asserted against the Reorganized Debtors in the Chapter 11 Cases appended to the Omnibus Objection Procedures Order as Exhibit 1 (the “*Objection Procedures*”). The Objection Notice (as defined in the Objection Procedures) and the Objection Procedures will be served on the holders of the Late-Filed Claims along with this Objection.

⁴ On September 7, 2025, the Reorganized Debtors filed their respective schedules of assets and liabilities (the “*Schedules*”) and statements of financial affairs [Docket Nos. 177–322], pursuant to Bankruptcy Rule 1007.

⁵ Under section 1111(a) of the Bankruptcy Code, scheduled claims are treated as proofs of claim. *See* 11 U.S.C. § 1111(a) (“A proof of claim . . . is deemed filed under section 501 of this title for any claim . . . that appears in the schedules . . . except a claim . . . that is scheduled as disputed, contingent, or unliquidated.”).

⁶ *See* Plan, p. 3 (defining “Claims Objection Deadline” as “ninety (90) days after the Effective Date . . . which dates may be extended pursuant to an order of the Bankruptcy Court upon a motion Filed by the Reorganized Debtors.”).

⁷ The Claims Objection Deadline with respect to claims filed by governmental units is ninety (90) days after the Governmental Bar Date, whereas for claims filed by non-governmental units it is ninety (90) days after the occurrence of the Effective Date.

THE LATE-FILED CLAIMS

14. The Reorganized Debtors' review of the Claims Register allowed them to identify the Late-Filed Claims. This Objection seeks to disallow the Late-Filed Claims in their entirety because each Late-Filed Claim was filed after the applicable Bar Date.

15. As attested to in the *Affidavit of Kenneth Shepard in Support of Debtors' Eighth Omnibus Objection to Certain Claims* attached hereto as **Exhibit A**, based on their review of the Claims Register, the Reorganized Debtors and their advisors identified each Late-Filed Claim on **Schedule 1** to the Proposed Order as being filed after the occurrence of the applicable Claims Bar Date. To identify the Late-Filed Claims, the Reorganized Debtors:

- (a) reviewed the Claims Register to identify instances in which a Claim was submitted after the applicable Claims Bar Date; and
- (b) determined that there were no agreements or other arrangements between the holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the relevant Claims Bar Date.

16. The Reorganized Debtors hereby request that the Late-Filed Claims be disallowed in their entirety and expunged.

BASIS FOR RELIEF

17. Section 502 of the Bankruptcy Code provides, in pertinent part, that: “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest ... objects.” 11 U.S.C. § 502. Moreover, section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed if “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law” 11 U.S.C. § 502(b)(1). Bankruptcy Rule 3007 provides certain grounds upon which “objections to more than one claim may be joined in a single objection.” FED. R. BANKR. P.

3007(d). This includes objections on the grounds that claims should be disallowed because they “were not timely filed.” FED. R. BANKR. P. 3007(d)(2)(D).

18. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g., In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). A proof of claim loses the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim’s legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id.* Despite this shifting burden during the claim objection process, “the ultimate burden of proof always lies with the claimant.” *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Rev.*, 530 U.S. 15 (2000)).

19. Here, the Court established, pursuant to the Claims Bar Date Order, the Claims Bar Date as the deadline by which creditors were required to file a Proof of Claim conforming to the requirements set forth in the Claims Bar Date Order. The Claims Bar Date Order, in turn, expressly provides that the timely filing of a Proof of Claim was a prerequisite “in order to share in the Debtors’ estates,” Claims Bar Date Order, ¶ 5, and expressly provides that a creditor who failed to timely file a Proof of Claim “shall not be treated as a creditor with respect to such claim for purposes of voting and distribution.” *Id.* at ¶ 20. As set forth above, the Late-Filed Claims were not filed by the applicable Claims Bar Date, and, thus, are subject to disallowance under the express terms of the Claims Bar Date Order.

20. Therefore, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Plan, the Reorganized Debtors respectfully request that the Court enter the Proposed Order granting the relief requested herein.

RESERVATION OF RIGHTS

21. The Reorganized Debtors reserve the right to amend, modify, or supplement this Objection, and to file additional objections to any other Claims (filed or not) that may be asserted against the Reorganized Debtors and their estates. Should one or more of the grounds of objection stated in the Objection be dismissed or overruled, the Reorganized Debtors reserve the right to object to each of the Late-Filed Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

22. Nothing contained herein shall be deemed: (a) an admission as to the amount of, basis for, or validity of any Claim against the Reorganized Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any Claim against, or interest in, the Reorganized Debtors, or their property or estates; (c) a promise or requirement to pay any prepetition Claim; (d) an implication or admission that any particular Claim is of a type specified or defined in this Objection, or any order granting the relief requested by this Objection; (e) an implication, admission, or finding as to (i) the validity, enforceability, or perfection of any interest or encumbrance on the property of the Reorganized Debtors or their estates or (ii) the applicability of any exception or exclusion from property of the estate under section 541 of the Bankruptcy Code or other applicable law; (f) an impairment or waiver of any claims or causes of action which may exist against any entity; or (g) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law.

NOTICE

23. Notice of this Objection will be given to the Claimants, the parties on the Reorganized Debtors' Master Service List, and all parties that have requested or that are required to receive notice pursuant to Bankruptcy Rule 2002. The Reorganized Debtors submit that, under the circumstances, no other or further notice is required.

24. A copy of this Objection is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Claims and Noticing Agent at <https://www.veritaglobal.net/ModivCare>.

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter the Proposed Order sustaining the Objection and granting such other and further relief as may be just and proper.

Dated: March 26, 2026

Respectfully submitted,

/s/ Timothy A. ("Tad") Davidson II

HUNTON ANDREWS KURTH LLP

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Catherine A. Rankin (Texas Bar No. 24109810)

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Co-Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on March 26, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II
Timothy A. ("Tad") Davidson II

Exhibit A

Shepard Declaration

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

-----	X
	:
In re:	: Chapter 11
	:
MODIVCARE INC., <i>et al.</i> ,	: Case No. 25-90309 (ARP)
	:
Reorganized Debtors. ¹	: (Jointly Administered)
	:
-----	X

**AFFIDAVIT OF KENNETH SHEPARD
IN SUPPORT OF REORGANIZED DEBTORS’
EIGHTH OMNIBUS OBJECTION TO CERTAIN CLAIMS**

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this “*Affidavit*”) in support of the *Reorganized Debtors’ Eighth Omnibus Objection to Certain Claims* (the “*Objection*”)² pursuant to Rule 3007-1 of the Local Bankruptcy Rules for the Southern District of Texas.

2. I am a senior vice president of finance for the Reorganized Debtors a role that I have served in for approximately two years. I have worked for the Reorganized Debtors for over ten years and in finance for approximately 20 years.

3. I am knowledgeable about, and familiar with, the Reorganized Debtors’ day-to-day operations, business and financial affairs, books and records, and the circumstances that led to the commencement of the Chapter 11 Cases. The facts set forth in this Declaration are based upon

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Objection.

my personal knowledge, my review of relevant documents, information provided to me by employees working under my supervision, my own reasonable inquiry, and/or my discussions with the Reorganized Debtors' other officers, directors, and restructuring advisors, including professionals at Latham & Watkins LLP, Hunton Andrews Kurth LLP, Moelis & Company, FTI Consulting, Inc., and Kurtzman Carson Consultants, LLC d/b/a Verita Global. If called upon to testify, I would testify to the facts set forth in this Affidavit. I am authorized to submit this Affidavit.

OBJECTION TO LATE-FILED CLAIMS

4. Article VII of the Plan empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified certain Late-Filed Claims which they seek the disallowance of in their entirety.

5. The Late-Filed Claims were identified after the Reorganized Debtors:
- (a) reviewed the Claims Register to identify instances in which more a Claim was submitted after the applicable Bar Date; and
 - (b) determined that there were no agreements or other arrangements between the Holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the Claims Bar Date.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 26, 2026

/s/ Kenneth Shepard

Name: Kenneth Shepard

Title: Senior Vice President – Finance
ModivCare Solutions, LLC and its
Reorganized Debtor Affiliates

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	x	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	x	

**ORDER GRANTING REORGANIZED DEBTORS’
EIGHTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**
[Relates to Docket No.]

Upon the objection (the “*Objection*”)² of the Reorganized Debtors seeking entry of an order (this “*Order*”) disallowing the Late-Filed Claims in their entirety as set forth in **Schedule 1** hereto, all as more fully set forth in the Objection; and the Court having reviewed the Objection; and the Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and that no other or further notice is necessary, except as set forth in this Order; and all responses, if any, to the Objection having been withdrawn, resolved, or overruled; and upon the record herein; and upon the record herein; and after due deliberation

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Objection.

thereon; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Objection is in the best interests of the Reorganized Debtors, their estates, their creditors, and other parties in interest, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is GRANTED, as set forth herein.
2. Each Late-Filed Claim listed on Schedule 1 is disallowed and expunged in its entirety.
3. The Claims and Noticing Agent is authorized to update the claims register maintained in the Chapter 11 Cases to reflect the relief granted in this Order.
4. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in the Objection or this Order shall be deemed a waiver of the rights of the Reorganized Debtors to object to any Claim, and shall not constitute an admission of liability by the Reorganized Debtors with respect to any Proof of Claim or application for administrative expenses.
5. Each Late-Filed Claim and the Reorganized Debtors' objections to each Late-Filed Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Late-Filed Claim.
6. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any Claim against the Reorganized Debtors; (b) as a waiver of the Reorganized Debtors' rights to dispute or otherwise object to any Claim on any grounds or basis; or (c) to waive or release any right, claim, defense, or counterclaim of the Reorganized Debtors,

or to estop the Reorganized Debtors from asserting any right, claim, defense, or counterclaim (including setoff).

7. Notice of the Objection as provided therein shall be deemed good and sufficient and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

8. Notwithstanding any applicable Bankruptcy Rules to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon its entry.

9. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Objection.

10. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____, 2026

UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

Late Filed Claims 501 - 510							Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Claim Nature	Claim Amount		
501	Worsley, Sultan G	ModivCare Inc.	2123	11/21/2025	General Unsecured Priority Secured Admin Priority Total	60,000 - - \$60,000		
502	Wren, Pattie	ModivCare Inc.	2355	2/3/2026	General Unsecured Priority Secured Admin Priority Total	- - - -		
503	Wright, Sharon	ModivCare Inc.	2047	11/4/2025	General Unsecured Priority Secured Admin Priority Total	100 - - -		
504	YAHWEH TRANSPORT SERVICES LLC	ModivCare Inc.	1799	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- 3,800 - 3,800 \$7,600		
505	Yildiz, Robert	ModivCare Inc.	2161	12/3/2025	General Unsecured Priority Secured Admin Priority Total	1,376 - - -		
506	Youngblood, Helen	ModivCare Inc.	1965	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - \$1,376		
507	Zackery, Kenyetta N	ModivCare Inc.	1845	10/8/2025	General Unsecured Priority Secured Admin Priority Total	- - - -		
508	ZarleyConley	Higi SH LLC	2277	1/19/2026	General Unsecured Priority Secured Admin Priority Total	420 - - \$420		
509	ZBS Logistics, LLC	ModivCare Inc.	2379	2/2/2026	General Unsecured Priority Secured Admin Priority Total	16,922 - - \$16,922		
510	Zumwalt, April	ModivCare Solutions, LLC	1883	10/12/2025	General Unsecured Priority Secured Admin Priority Total	- - - -		

Appendix 2

Objection Procedures

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

	x	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	x	

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors² may file omnibus objections (each, an “*Omnibus Objection*”) to Claims on the grounds that such Claims, in part or in whole:

- (a) are inconsistent with the Reorganized Debtors’ books and records;
- (b) fail to specify the asserted Claim amount (or only list the Claim amount as “unliquidated”);
- (c) seek recovery of amounts for which the Reorganized Debtors are not liable;
- (d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors’ Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;
- (e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;
- (f) fail to specify a Reorganized Debtor against which the Claim is asserted;

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the “*Motion*”).

- (g) are disallowed pursuant to section 502 of the Bankruptcy Code;
- (h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;
- (i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;
- (j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the “*Withdrawal Form*”) available on the Claims and Noticing Agent’s website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);
- (k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;
- (l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors’ insurers (in which case the details of payments must be included with the Omnibus Objection); or
- (m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the rescission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors’ objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

- (a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;
- (b) the asserted amount of the Claim;
- (c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;
- (d) a summary of the grounds for the objection;
- (e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and
- (f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "**Order**") as Exhibit 2 (the "**Objection Notice**"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

- (a) adequately describe the nature of the objection;
- (b) inform Holders that their rights may be affected by the objection;
- (c) describe the procedures for filing a written response (each, a "**Response**") to the objection, including all relevant dates and deadlines related thereto;
- (d) identify the hearing date, if applicable, and related information; and
- (e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "**Response Procedures**") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and
- (c) the following contact information for the responding party:
 - (i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov/>.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.